

ALL PURPOSE CHECKLIST

DOLLINS HTRB

TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA

ACCUMULATION POINT INSPECTION CHECKLIST

OPR
SSgt
Dodson

DATE

6 Jan 97

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	DATE: 6 Jan 97 BLDG #: 578 SHOP NAME: Horizontal INSPECTOR: SSgt Driggers POINT #: OFFICE SYMBOL: CG #4 ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE: 1. SSgt Dodson 2. Mr. Walker			
	1. Cleanliness. Is there any evidence on the floor or the container of the waste being spilled?	✓		
	2. Is the area well organized? Are all containers in good condition and is the labelling facing so that it is easily seen? <i>Working</i>	✓		
	3. Are all hazardous materials separate from hazardous wastes?	✓		
	4. Are different types of waste being put into separate containers (keep wastes segregated)?	✓		
	5. Are all containers accurately and neatly labelled as to their contents?	✓		
	6. Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them?	✓		
	7. Are waste products being kept only at the point (no stray/ unknown containers)?	✓		
	8. Are the Hazardous waste containers kept closed when not in use?	✓		
	9. Is the accumulation point within sight/control of the manager or locked when not in use?	✓		
	10. Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date?	✓		
	11. Is the spill action plan accurately filled out and posted?	✓		
	12. Has the chance for a spill been minimized and is there adequate aisle space for the movement of spill response equipment and personnel?	✓		
	13. Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)?	✓		
	14. Are weekly inspections with this checklist being done?		✓	
	15. Is there a current copy of the Hazardous Material and Waste Management Plan at the shop?	✓		
	16. Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at that shop?	✓		
	17. Is a fire extinguisher within 50 feet of flammables and combustibles?	✓		

ALL PURPOSE CHECKLIST		PAGE 1	OF 2	PAGE:
TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA ACCUMULATION POINT INSPECTION CHECKLIST CONTINUED		OPR	DATE	
NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	18. Is there a 4" yellow line around the point, or is it contained in a <u>locked storage</u> area?	✓		
	19. Is there a current letter designating the hazardous waste monitor and alternate?	✓		
	20. Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented?	✓		
	21. Have all shop personnel handling hazardous waste been trained by these monitors on proper waste handling procedures, and has their training been documented?	✓		
	22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (Name and duty phone- _____)?			✓
	23. Are the shop hazardous waste instructions up-to-date, and have they been submitted to the Environmental Management Office for approval?			
	a. A list of each item generated.	✓		
	b. A description of how each waste is generated and how it is properly accumulated and called in for pick-up.	✓		
	c. A list of the proper labeling for each item accumulated.	✓		
	d. Accumulation Point Manager/Alternate appointment letter.	✓		
	e. A map citing the location of the point in your building.	✓		
	f. The approximate accumulation rate in gallons or pounds per month of each item.			✓
	g. Inspection procedures.	✓		
	24. Is there a <u>sign</u> designating the area as a accumulation point?	✓		
	25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?	✓		
	26. Is all hazardous waste being called in for pick-up after it has been accumulated for thirty days?	✓		

I
Current Inspector
@ B. H.

ALL PURPOSE CHECKLIST

PAGE 1 OF 2 PAGES

TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA

ACCUMULATION POINT INSPECTION CHECKLIST

OPR

3rd
Bennetts

DATE

20 Mar 97

NO.

ITEM

(Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)

YES

NO

N/A

DATE: 20 Mar 97

INSPECTOR: SS5 + Driggers

BLDG #: 518

POINT #:

SHOP NAME: Heavy Repair

OFFICE SYMBOL: CE0HH

ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE:

1. AIC Bennetts

2. Mr. Walker

1. Cleanliness. Is there any evidence on the floor or the container of the waste being spilled? ✓

2. Is the area well organized? Are all containers in good condition and is the labelling facing so that it is easily seen? ✓

3. Are all hazardous materials separate from hazardous wastes? ✓

4. Are different types of waste being put into separate containers (keep wastes segregated)? ✓

5. Are all containers accurately and neatly labelled as to their contents? ✓

6. Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them? ✓

7. Are waste products being kept only at the point (no stray/ unknown containers)? ✓

8. Are the Hazardous waste containers kept closed when not in use? ✓

9. Is the accumulation point within sight/control of the manager or locked when not in use? ✓

10. Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date? ✓

11. Is the spill action plan accurately filled out and posted? ✓

12. Has the chance for a spill been minimized and is there adequate aisle space for the movement of spill response equipment and personnel? ✓

13. Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)? ✓

14. Are weekly inspections with this checklist being done? ✓

15. Is there a current copy of the Hazardous Material and Waste Management Plan at the shop? ✓

16. Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at that shop? ✓

17. Is a fire extinguisher within 50 feet of flammables and combustibles? ✓

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NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	18. Is there a 4" yellow line around the point, or is it <u>contained</u> in a locked storage area?	✓		
	19. Is there a current letter designating the hazardous waste monitor and alternate?	✓		
	20. Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented? <u>One has / other scheduled</u>	✓		
	21. Have all shop personnel handling hazardous waste been trained by these monitors on proper waste handling procedures, and has their training been documented?	✓		
	22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (Name and duty phone- <u>Bennetts/Walker 767-8640</u>)?	✓		
	23. Are the shop hazardous waste instructions up-to-date, and <u>have</u> they been submitted to the Environmental Management Office for approval?	✓		
	a. ✓ A list of each item generated.			
	b. ✓ A description of how each waste is generated and how it is properly accumulated and called in for pick-up.			
	c. ✓ A list of the proper labeling for each item accumulated.			
	d. ✓ Accumulation Point Manager/Alternate appointment letter.			
	e. A map citing the location of the point in your building.			N/A
	f. ✓ The approximate accumulation rate in gallons or pounds per month of each item.			
	g. ✓ Inspection procedures.			
	24. Is there a <u>sign</u> designating the area as a accumulation point?	✓		
	25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?	✓		
	26. Is all hazardous waste being called in for pick-up after it has been accumulated for thirty days?	✓		

ALL PURPOSE CHECKLIST

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TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA

ACCUMULATION POINT INSPECTION CHECKLIST

OPR

DATE

13 FEB 98

NO.

ITEM

(Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)

YES

NO

N/A

DATE: 13 FEB 98

INSPECTOR: M. CARPENTER

BLDB #: 518

POINT #:

SHOP NAME: HORIZONTAL

OFFICE SYMBOL:

ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE:

1. HIGMGO 2. WALKER2. Is the area well organized? Are all containers in good condition and is the labeling facing so that it is easily seen? NO SOME UNLABELED

3. Are all the hazardous materials separated from hazardous wastes?

4. Are different types of waste being put into separate containers (keep wastes segregated)?

5. Are all containers accurately and neatly labeled as to their contents? unable to tell

6. Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them?

7. Are waste products being kept only at the point (no stray/unknown containers)?

8. Are the hazardous waste containers kept closed when not in use?

9. Is the accumulation point within sight/control of the manager or locked when not in use?

10. Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date?

UNKNOWN

11. Is the spill action plan accurately filled out and posted?

12. Has the chance for a spill been minimized and is there adequate aisle space for the movement of response equipment and personnel?

13. Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)?

14. Are weekly inspections with this checklist being done?

15. Is there a current copy of the Hazardous Material and Waste Management Plan at the shop?

UNKNOWN

16. Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at the shop?

17. Is there a fire extinguisher within 50 feet of flammables and combustibles?

18. Is there a 4" yellow line around the point, or is it contained in a locked storage area?

19. Is there a current letter designating the hazardous waste monitor and alternate?

20. Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented?

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (name and duty phone: _____)?	✓		
	23. Are the shop hazardous waste instructions up-to-date, and have they been submitted to the Environmental Flight for approval? <i>UNKNOWN</i>			
	a. A list of each item generated?			
	b. A description of how each waste is generated and how it is properly accumulated and called in for pick-up?	✓		
	c. A list of the proper labeling for each item accumulated.	✓		
	d. Accumulation Point Manager/Alternate appointment letter.	✓		
	e. A map citing the location of the point in your building.	✓		
	f. The approximate accumulation rate in gallons or pounds per month of each item.	✓		
	g. Inspection procedures.	✓		
	24. Is there a sign designating the area as an accumulation point?	✓		
	25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?	✓		
	26. Is all hazardous waste being called in for pick-up after it has been accumulated for 30 days?	✓		

ACCUMULATION POINT INSPECTION CHECKLIST

OPR

DATE

23 MAR 98

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	P
	DATE: 23 MAR 98 BLDB #: SHOP NAME: HALEY/REDAIR INSPECTOR: CARPENTER POINT #: OFFICE SYMBOL: QEDL ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE:			
1.	HIGADALGO			
2.	WALKER			
2.	Is the area well organized? Are all containers in good condition and is the labeling facing so that it is easily seen?	✓		
3.	Are all the hazardous materials separated from hazardous wastes?	✓		
4.	Are different types of waste being put into separate containers (keep wastes segregated)?	✓		
5.	Are all containers accurately and neatly labeled as to their contents?	✓		
6.	Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them?	✓		
7.	Are waste products being kept only at the point (no stray/unknown containers)?	✓		
8.	Are the hazardous waste containers kept closed when not in use?	✓		
9.	Is the accumulation point within sight/control of the manager or locked when not in use?	✓		
10.	Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date?	✓		
11.	Is the spill action plan accurately filled out and posted?			
12.	Has the chance for a spill been minimized and is there adequate aisle space for the movement of response equipment and personnel?			
13.	Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)?			
14.	Are weekly inspections with this checklist being done?			
15.	Is there a current copy of the Hazardous Material and Waste Management Plan at the shop?			
16.	Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at the shop?			
17.	Is there a fire extinguisher within 50 feet of flammables and combustibles?	✓		
18.	Is there a 4" yellow line around the point, or is it contained in a locked storage area?	✓		
19.	Is there a current letter designating the hazardous waste monitor and alternate?	✓		
20.	Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented?	✓		

NO.	ITEM <small>(Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)</small>	YES	NO
	<p>22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (name and duty phone: _____)?</p> <p>23. Are the shop hazardous waste instructions up-to-date, and have they been submitted to the Environmental Flight for approval? <u>UNKNOWN</u></p> <p>a. A list of each item generated?</p> <p>b. A description of how each waste is generated and how it is properly accumulated and called in for pick-up?</p> <p>c. A list of the proper labeling for each item accumulated.</p> <p>d. Accumulation Point Manager/Alternate appointment letter.</p> <p>e. A map citing the location of the point in your building.</p> <p>f. The approximate accumulation rate in gallons or pounds per month of each item.</p> <p>g. Inspection procedures.</p> <p>24. Is there a sign designating the area as an accumulation point?</p> <p>25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?</p> <p>26. Is all hazardous waste being called in for pick-up after it has been accumulated for 30 days?</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

ACCUMULATION POINT INSPECTION CHECKLIST

OPR

DATE

7 Apr

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES
	DATE: 7 Apr 98 BLDB #: SHOP NAME: INSPECTOR: K. Gore Carpenter POINT #: OFFICE SYMBOL: ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE:	
	1. MR FLOYD	
	2. MR Boyd	
	2. Is the area well organized? Are all containers in good condition and is the labeling facing so that it is easily seen?	✓
	3. Are all the hazardous materials separated from hazardous wastes?	
	4. Are different types of waste being put into separate containers (keep wastes segregated)?	
	5. Are all containers accurately and neatly labeled as to their contents?	
	6. Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them?	
	7. Are waste products being kept only at the point (no stray/unknown containers)?	
	8. Are the hazardous waste containers kept closed when not in use?	
	9. Is the accumulation point within sight/control of the manager or locked when not in use?	✓
	10. Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date?	✓
	11. Is the spill action plan accurately filled out and posted?	
	12. Has the chance for a spill been minimized and is there adequate aisle space for the movement of response equipment and personnel?	✓
	13. Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)?	✓
	14. Are weekly inspections with this checklist being done?	
	15. Is there a current copy of the Hazardous Material and Waste Management Plan at the shop?	✓
	16. Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at the shop?	✓
	17. Is there a fire extinguisher within 50 feet of flammables and combustibles?	✓
	18. Is there a 4" yellow line around the point, or is it contained in a locked storage area?	
	19. Is there a current letter designating the hazardous waste monitor and alternate?	✓
	20. Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented?	✓

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES
	22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (name and duty phone: _____)?	✓
	23. Are the shop hazardous waste instructions up-to-date, and have they been submitted to the Environmental Flight for approval?	✓
	a. A list of each item generated?	
	b. A description of how each waste is generated and how it is properly accumulated and called in for pick-up?	
	c. A list of the proper labeling for each item accumulated.	
	d. Accumulation Point Manager/Alternate appointment letter.	
	e. A map citing the location of the point in your building.	
	f. The approximate accumulation rate in gallons or pounds per month of each item.	
	g. Inspection procedures.	
	24. Is there a sign designating the area as an accumulation point?	✓
	25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?	✓
	26. Is all hazardous waste being called in for pick-up after it has been accumulated for 30 days?	

ALL PURPOSE CHECKLIST

PAGE 1 OF 2 PAGES

TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA

OPR

DATE

ACCUMULATION POINT INSPECTION CHECKLIST

NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	DATE: 18 MAR 98 BLDG #: 902 SHOP NAME: HOUSEHOLD MAINT INSPECTOR: CARPENTER POINT #: OFFICE SYMBOL: ACCUMULATION POINT MANAGER/ALTERNATE NAMES AND DUTY PHONE: 1. MR FLOYD 2. MR BARD			
	1. Cleanliness. Is there any evidence on the floor or the container of the waste being spilled?	✓		
	2. Is the area well organized? Are all containers in good condition and is the labelling facing so that it is easily seen?		✓	
	3. Are all hazardous materials separate from hazardous wastes?		✓	
	4. Are different types of waste being put into separate containers (keep wastes segregated)?		✓	
	5. Are all containers accurately and neatly labelled as to their contents?		✓	
	6. Do all containers with hazardous waste have the words "HAZARDOUS WASTE" on them?		✓	
	7. Are waste products being kept only at the point (no stray/ unknown containers)?	✓		
	8. Are the Hazardous waste containers kept closed when not in use?	✓		
	9. Is the accumulation point within sight/control of the manager or locked when not in use?			
	10. Is there a log/profile sheet for each waste container? Are logs filled out and kept up-to-date?		✓	
	11. Is the spill action plan accurately filled out and posted?	✓		
	12. Has the chance for a spill been minimized and is there adequate aisle space for the movement of spill response equipment and personnel?	✓		
	13. Is there a spill kit present (an open head drum which will hold the largest container of waste, proper absorbent, face shields, aprons, and rubber gloves as applicable)?	✓		
	14. Are weekly inspections with this checklist being done?		✓	
	15. Is there a current copy of the Hazardous Material and Waste Management Plan at the shop?	✓		
	16. Are Material Safety Data Sheets (MSDS) available to all shop personnel for each hazardous material used at that shop?	✓		
	17. Is a fire extinguisher within 50 feet of flammables and combustibles?			

TITLE/SUBJECT/ACTIVITY/FUNCTIONAL AREA

OPR

DATE

ACCUMULATION POINT INSPECTION CHECKLIST CONTINUED

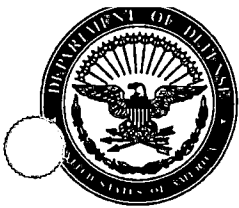
NO.	ITEM (Assign a paragraph number to each item. Draw a horizontal line between each major paragraph.)	YES	NO	N/A
	18. Is there a 4" yellow line around the point, or is it contained in a locked storage area?		✓	
	19. Is there a current letter designating the hazardous waste monitor and alternate?	✓		
	20. Have these monitors been through the Air Force Hazardous Waste Training Program here at Bolling, and is this documented?	✓		
	21. Have all shop personnel handling hazardous waste been trained by these monitors on proper waste handling procedures, and has their training been documented?		✓	
	22. Is there a current Squadron hazardous waste manager, to be designated by the Squadron Commander (Name and duty phone- _____)?		✓	
	23. Are the shop hazardous waste instructions up-to-date, and have they been submitted to the Environmental Management Office for approval?		✓	
	a. A list of each item generated.		✓	
	b. A description of how each waste is generated and how it is properly accumulated and called in for pick-up.		✓	
	c. A list of the proper labeling for each item accumulated.		✓	
	d. Accumulation Point Manager/Alternate appointment letter.		✓	
	e. A map citing the location of the point in your building.		✓	
	f. The approximate accumulation rate in gallons or pounds per month of each item.		✓	
	g. Inspection procedures.		✓	
	24. Is there a sign designating the area as a accumulation point?		✓	
	25. Have all drums containing hazardous waste been dated immediately upon waste being placed in them?		✓	
	26. Is all hazardous waste being called in for pick-up after it has been accumulated for thirty days?	✓		

BOLLING AFB 4

FINAL
BOLLING AIR FORCE BASE
HAZARDOUS WASTE MANAGEMENT PLAN

Prepared by:
11th Civil Engineer Squadron
Bolling AFB DC

JANUARY 1998



DEPARTMENT OF THE AIR FORCE
11TH WING



31 December 1997

MEMORANDUM FOR SEE DISTRIBUTION

FROM: 11 WG/CC

SUBJECT: Letter of Instruction--Bolling Air Force Base Hazardous Waste Management Plan

1. The 11th Civil Engineer Squadron Environmental Flight has written a comprehensive Hazardous Waste Management Plan for Bolling Air Force Base and its tenants. This mandatory plan has been prepared in accordance with DOD, Air Force, EPA, OSHA, DOT, and District of Columbia environmental, worker safety, and transportation requirements.
2. The plan is applicable to all installation activities, tenant organizations, and contractors which generate, treat, store, or respond to releases involving hazardous waste within the confines of Bolling Air Force Base. The plan assigns responsibility and provides instruction for appropriate waste handling and management to ensure conformance with the policies established by the agencies listed above.
3. Bolling AFB and its tenants must implement and comply with the provisions of the Hazardous Waste Management Plan at all times.

PETER U. SUTTON, Colonel, USAF
Commander

2. INFORMATION AND EMERGENCY CONTACTS

BOLLING AIR FORCE BASE			
ON-BASE EMERGENCY REPORTING (Fires, Explosions, Releases, or Spills)			
Base Fire Department		7-5777	
OFF-BASE EMERGENCY REPORTING INVOLVING AIR FORCE ASSETS (Fires, Explosions, Releases, or Spills of Hazardous Waste Off-Base)			
#1. Local Emergency Reporting		911	
#2. Base Command Post		767-1111	
CHEMICAL EMERGENCY INFORMATION AND ASSISTANCE			
CHEMTREC		(800) 424-9300	
FEDERAL, STATE, AND LOCAL RELEASE NOTIFICATION/REPORTING			
National Response Center		(800) 424-8802	
State Emergency Response Commission (SERC)		(202) 673-2102 ext 3161	
Local Emergency Planning Commission (LEPC)		(202) 673-3320	
AIR FORCE RELEASE REPORTING			
Command Post		7-4011	
Environmental Flight Office		7-8600	
ON-BASE ASSISTANCE AND INFORMATION			
Environmental Coordinator	7-1159	Bioenvironmental Engineer	4-7740
Civil Engineering Service Call	7-5565 7-4442/7-4444	Base Clinic	7-5533
Ground Safety	7-4444	Security Police	7-5646
Public Affairs	7-4781	Contracting officer	4-8100
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APPENDIX A References

**BOLLING AIR FORCE BASE
HAZARDOUS WASTE MANAGEMENT PLAN**

3b. RECORD OF CHANGES

Change Number	Change Date	Posting Date	Signature & Organization

3c. LIST OF TABLES AND FIGURES

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8-2	BAFB Hazardous Waste Locations
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8-4	EPA Priority Pollutants
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10-2	Identification Codes for Non-Bulk Packaging
10-3	Instructions for Completing AF Form 2005
10-4	Instructions for Completing DoD Form 1348-1
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10-6	RCRA Records and Corresponding Minimum Retention Periods
12-1	Hazardous Waste Training Requirements for BAFB Personnel
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14-2	BAFB HAZMAT Team
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<u>Number</u>	<u>Figure Title</u>
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10-5	Required EPA Marking for Non-Bulk Packaging (Containers of 110 gallons or Less)
10-6	Hazardous Waste Manifest
10-7	Instructions for Completing the Hazardous Waste Manifest

3d. LIST OF ACRONYMS, ABBREVIATIONS, and TERMS

SECTION A - ABBREVIATIONS and ACRONYMS

AAFES	Army and Air Force Exchange Service
ACC	Air Combat Command
AFCEE	Air Force Center for Environmental Excellence
AF	Air Force
AFB	Air Force Base
AFDW	Air Force District of Washington
AFI	Air Force Instruction
AFR	Air Force Regulation
AFO	Accounting and Finance Officer
AFPAM	Air Force Pamphlet
AL	Armstrong Laboratory
AOC	Areas of Concern
ASTM	American Society of Testing Materials
BAFB	Bolling Air Force Base
BEE	Bioenvironmental Engineer
CAF	Central Accumulation Facility
CE	Civil Engineer
CERF	Financial Management Element
CES	Civil Engineer Squadron
CEV	Environmental Flight
CFR	Code of Federal Regulations
COC	Chain-of Custody
CLIN	Contract Line Item Number
CY	Calendar Year
DC	District of Columbia
DCC	District of Columbia Code
DCMR	District of Columbia Municipal Regulations
DCRA	Department of Consumer and Regulatory Affairs
DIA	Defense Intelligence Agency
DoD	Department of Defense
DOT	Department of Transportation
DRMO	Defense Reutilization and Marketing Office
DRMS	Defense Reutilization and Marketing Service
DSN	Defense System Number
EC	Environmental Compliance
ECAMP	Environmental Compliance Assessment and Management Program
EHSC	Environmental Health and Safety Committee
EO	Executive Order
EPA	Environmental Protection Agency

EPC	Environmental Protection Committee
EPCRA	Emergency Planning and Community Right to Know Act
ESOH	Environment, Safety, and Occupational Health Committee
FFCA	Federal Facilities Compliance Act
FY	Fiscal Year
HAZMAT	Hazardous Material(s)
HMERP	Hazardous Materials Emergency Response Plan
HMMS/IPT	Hazardous Material Management System Integrated Process Team
HQ ACC	Headquarters, Air Combat Command
HQ MAJCOM	Headquarters Major Command
HW	Hazardous Waste
HWM	Hazardous Waste Management
HWMP	Hazardous Waste Management Plan
IAP	Initial Accumulation Point
IC	Installation Commander
LG	Logistics Group
LQG	Large Quantity Generator
MG	Medical Group
MSDS	Material Safety Data Sheets
NRL	Naval Research Laboratory
OG	Operations Group
OPR	Office of Primary Responsibility
OSHA	Occupation Safety and Health Administration
PAO	Public Affairs Office
POVs	Privately Owned Vehicles
PPE	Personal Protective Equipment
PPMP	Pollution Prevention Management Plan
P3P	Pollution Prevention Program Plan
QA/QC	Quality Assurance/Quality Control
QA/RM	Quality Assurance/Risk Management
RCRA	Resource Conservation and Recovery Act
SAP	Satellite Accumulation Point
SG	Support Group
SPRP	Spill Prevention and Response Plan
SQG	Small Quantity Generator
SWHCRF	Special Waste from Health Care Related Facilities
TCLP	Toxicity Leaching Characteristic Procedures
"TIN"	Turn-in Action
TSDF	Treatment, Storage, or Disposal Facility
USAF	United States Air Force
WAP	Waste Analysis Plan
WIMS-ES	Work Information Management System-Environmental Subsystem

SECTION B - TERMS

Accumulation Site: A provision of 40 CFR 262, subpart C, which allows large quantity generators to store hazardous waste for a period of 90 days without a storage permit, or without having interim status.

Acute (or extremely) Hazardous Waste: A solid waste which is considered to be especially dangerous, and which must be managed even more carefully than other hazardous waste. Acute hazardous waste includes all P-list wastes and some F-list wastes (40 CFR 261.31, 261.32, and 261.33)

Central Accumulation Facility: Typically a storage facility, distant from all HW generating activities, where all waste streams are eventually stored in order to facilitate disposal off base.

Characteristic Waste: A waste with any characteristic listed in 40 CFR 261, subpart C (for example, toxicity, corrosiveness, ignitability, or reactivity).

EPA Waste Code: An EPA HW number listed in 40 CFR 261, subpart C (characteristic waste) or subpart D (listed waste).

Generator: A person or a site, whose act or process produces HW or whose act first subjects HW to regulation. EPA and state environmental regulatory agencies typically consider the Air Force installation as the generator.

Hazardous Material (HAZMAT): Any usable material that presents a physical or health hazard and requires a Material Safety Data Sheet (MSDS).

Hazardous Waste (HW): Any waste by-product that can pose a substantial or potential hazard to human health or the environment when improperly managed; possesses at least one of the following characteristics (toxic, corrosive, ignitable, explosive, or chemically reactive); or is listed in 40 CFR 261.3 or applicable state or local waste management regulations.

Hazardous Waste Generating Activity: Each installation organization (including Air Force and non-Air Force tenants) that generates HW.

Hazardous Waste Management: Systematic control of the collection, source separation, storage, transportation, recovery, and disposal of hazardous waste.

Hazardous Waste Management Plan (HWMP): An installation developed plan containing guidance for base personnel on federal, state, and local procedures for managing HW and incorporating pollution prevention practices into HW management practices. The HWMP should include all tenants, including Government-owned, and contractor-operated (GOCO) facilities that generate HW.

Hazardous Waste Profile Sheet: A document (DRMS Form 1930) that describes the physical and chemical properties of a HW and is used for all HW disposal actions.

High Volume Waste Stream: Generates four or more 55-gal drums of waste per year.

Initial Accumulation Point (IAP): A collection point located at or near the point where wastes are initially generated. The area must be under the control of the operator of the process generating the waste. The operator should be near the area enough to detect a leak within a reasonable time frame. Under DC regulations, unlimited volumes of waste may be accumulated at an IAP for a period up to 90 days.

Large Quantity Generator: A generator that generates more than 50 kg of HW in a calendar month, as defined by DC regulations.

Listed Waste: A specifically identified solid waste, material, or item listed in 40 CFR 261, subpart D.

Low Volume Waste Stream: Generates three or less 55-gal drums of waste per year.

Hazardous Waste Manifest: HW shipping document required by federal or state regulatory agencies for tracking the transportation of HW from the generator to a permitted or interim status treatment, storage, or disposal facility (refer to 40 CFR 262, subpart B). Manifests must be signed by the installation commander or a named representative.

Resource Conservation and Recovery Act (RCRA): Enacted by Congress in 1976, established the generator as the responsible party for proper HW management from "cradle to grave" and became the regulatory program to protect human health and the environment from the improper management of HW.

Small Quantity Generator: A generator that generates less than 50 kg of HW in a calendar month, as defined by DC regulations.

Waste: (1) A material or product that is no longer useful for its intended purpose, (2) an unusable by-product, or (3) anything that the base tends to discard by disposal.

4. INTRODUCTION

4.1 BACKGROUND

4.1.1 Objective

The USAF is committed to the proper management of hazardous waste (HW) generated at Air Force installations. The primary objective of this Hazardous Waste Management Plan (HWMP) is to give hazardous waste managers at Bolling Air Force Base (BAFB) the essential tools for effective management of HW.

4.1.2 Regulatory Background

Subtitle C of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, directed the EPA to promulgate regulations to protect human health and the environment from the improper management of HW. On 19 May 1980, the United States Environmental Protection Agency (EPA) published the Hazardous Waste Management System Rules. RCRA was again amended in 1984.

In March 1985, the District of Columbia (DC) was granted authorization by the EPA to enforce their own HW management program to implement RCRA in DC. The Department of Consumer and Regulatory Affairs (DCRA) in DC was appointed the lead agency for carrying out this task. The Federal Facilities Compliance Act (FFCA) of 1992 requires Department of Defense (DoD) facilities to comply with all federal, state, and local environmental regulations in the same manner as private facilities. The FFCA allows federal and state agencies to assess DoD facilities with RCRA violation fines. AFPAM-32-7042 and 7043 provide guidance for managing hazardous waste at Air Force installations to meet federal, state, DoD, Air Force, and local environmental, worker safety, and transportation requirements. The procedures of this HWMP will be used to comply with these regulations and requirements. Plan revisions shall reflect changes in either level of HW management laws and regulations. Each revision to this HWMP will become effective immediately upon distribution unless otherwise noted herein. See Appendix A, References, for a complete list of federal, state, Air Force, and local regulations pertaining to the plan.

4.1.3 Implementation

Implementation of the comprehensive HW management program requires maximum cooperation of all activities located on BAFB. Environmental Flight (CEV), part of the 11th Civil Engineer Squadron (CES), is responsible for ensuring that all requirements of this HWMP are implemented by the installation. CEV is also responsible for completing and submitting permit applications and reports required by the EPA and the Department of Consumer and Regulatory Affairs (DCRA). CEV should ensure that all base units and tenant units engaging in activities that generate HW, including the Artificial Intelligence Division of the National Research Laboratory (NRL) and the Defense Intelligence Agency (DIA) who assume all or most management responsibility for the HW that they generate, are knowledgeable and responsive to the applicable requirements of this HWMP.

4.1.4 Bolling Air Force Base Location

BAFB is located in the southeast section of Washington, DC along the east bank of the Potomac River. The base is bordered to the north by Anacostia Naval Station, to the south by the Naval Research Laboratory, and to the east by South Capitol Street and Interstate 295. BAFB covers an area of approximately 616.5 acres (Figure 7-1).

4.1.5 Bolling Air Force Base Mission

BAFB is the home of the 11th Wing. The 11th Wing consists of four groups: 11th Operations Group (OG) (includes USAF Honor Guard and Band), 11th Support Group (SG), 11th Medical Group (MG), and 11th Logistics Group (LG). Also included at BAFB is DIA, and the Artificial Intelligence Division of NRL. The primary mission of BAFB is to provide administrative and housing support to USAF personnel in the Washington, DC area and to the 40,000 USAF personnel in over 80 countries formerly supported by the Air Force District of Washington (AFDW). No active flying or missile operations occur at the base.

4.2 COMPLIANCE STATUS

4.2.1 HW Generator Status

Although there are several HW generating activities at BAFB, the installation as a whole is classified as a single generator. Currently BAFB operates as a large quantity generator (LQG). DC Hazardous Waste Regulations (20A DCMR 40-54) differentiates between two types of generators: small quantity generator (SQG) who generate less than 50 kg of HW in a calendar month, and LQG who generates more than 50 kg of HW in a calendar month. Although individual activities at BAFB tend to generate low volumes of HW, collectively the volume of HW generated per calendar month tends to exceed SQG limits. Therefore, to ensure on-going compliance, the base should continue operating in accordance with the more stringent LQG requirements as set forth in this HWMP.

4.3 SCOPE OF THE HAZARDOUS WASTE MANAGEMENT PLAN

4.3.1 Applicability to BAFB

The purpose of the BAFB HWMP is to provide BAFB with HW management procedures and practices based on RCRA requirements as enforced by the EPA and the District of Columbia and to incorporate whenever possible, current base HW procedures and practices. The plan covers control and management of HW from its point of generation to the point of disposal.

4.3.2 Applicability of Federal and State Requirements

The BAFB HWMP has been developed to assist those responsible for managing hazardous waste at the base to effectively meet the complex requirements of RCRA as enforced by the EPA and the District of Columbia. The plan addresses mandatory requirements of the District of Columbia HW Management Regulations (20A DCMR 40-54) and the Air Force Hazardous Waste Management Guide (AFPAM 32-7042 and 7043).

4.4 HAZARDOUS WASTE OVERVIEW

The BAFB HWMP will follow an EPA "cradle-to-grave" philosophy for HW management and control. To better understand the "cradle-to-grave" philosophy, a breakdown of the HW life-cycle process is displayed in Figure 4-1 and described in the following paragraphs.

Air Force Pamphlet 32-7043 (Hazardous Waste Management Guide) describes the HW life-cycle process as consisting of three phases:

1. Generation
2. Storage
3. Disposal

Seven process steps are used to manage HW as it passes through each life-cycle phase:

1. Characterization
2. Container/Tank Management
3. Generator Classification
4. Accumulation Management
5. Turn-in
6. Transportation
7. Disposal

Understanding the HW life-cycle and properly performing each process step will facilitate proper HW management. Serious legal and environmental impacts may result from deficient or insufficient HW management. Legal impacts are specified by numerous regulations and legislation, resulting in criminal and civil penalties. Environmental impacts from HW mismanagement extend beyond the individual to society. Impacts from accidental releases can be detrimental to the environment and human health.

For additional information on procedures, prevention, and personnel safety, reference:
Bolling Air Force Base Spill Prevention and Response Plan, Draft, February 1995.

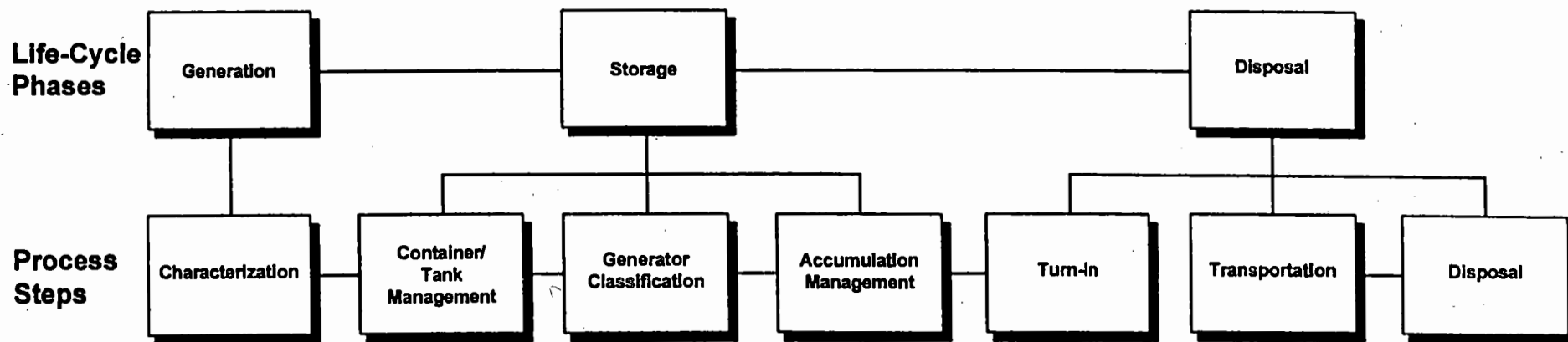


Figure 4-1. Hazardous waste life-cycle phases and process steps.

Source: Air Force Pamphlet 32,7043, 30 April 1994

5. RESPONSIBILITIES

5.1 TASKED ORGANIZATIONS

The BAFB organizations that are subject to this HWMP consist of: 11th Operations Group, 11th Support Group, 11th Medical Group, and 11th Logistics Group; as well as tenant units Defense Intelligence Agency (DIA) and the National Research Laboratory (NRL). An organizational chart for BAFB is displayed as Figure 6-1.

All Base organizations that generate, accumulate, monitor, dispose of, or respond to, incidents involving HW are responsible for complying with this HWMP. Base compliance with federal, state, and local HW laws and regulations is the responsibility of the 11 CES/CEV. Organizations tasked under this plan include, but are not limited to, the organizations listed in Section 5.2.

5.2 SPECIFIC RESPONSIBILITIES

5.2.1 Environmental Flight (CEV)

CEV is directly responsible for managing the Base HWMP. CEV acts as the installation liaison on environmental compliance matters with regulatory agencies on all HW issues. CEV is responsible for the following:

Agency Coordination

- Coordinating with federal, state, county, and city authorities on HW management procedures;
- Providing all applicable records and preparing and submitting annual reports to the EPA, SERC, and LEPC; and
- Acting as the base and tenant liaison with EPA, SERC, LEPC, and other regulatory agencies in regard to HW inspections, environmental compliance matters, rule interpretation, and problem resolution.

Accumulation Point Responsibilities

- Overseeing HW management at the CAF and IAPs;
- Appointing the HW CAF and IAP managers and alternate managers;
- Ensuring that management of the CAF and IAP complies with federal and state regulations;

- In coordination with Bioenvironmental Engineering (BEE), ensuring each generating activity properly completes DRMS Form 1930 (Hazardous Waste Profile Sheet, see Figure 9-3);
- Allowing appropriate facilities, shops, and equipment to be inspected for HW management regulatory compliance by fire, safety and health personnel, ECAMP team members, and authorized federal or state inspectors; and
- Ensuring all CAF and IAP personnel receive the appropriate level of HW training.

HW Turn-in Operations

- Assisting waste generating activities in HW identification, management, minimization, recycling, storage, and disposal;
- Ensuring all HW is accurately weighed for disposal actions;
- Submitting requests to the BEE to ensure that waste is evaluated and that HW is properly classified;
- Certifying that HW is properly characterized, labeled, and packaged;
- Maintaining a HW file for each HW stream within the generating activity;
- Providing technical information on completion of HW turn-in documents to IAP Managers;
- Assisting the generating activity in the completion and updating of DRMS Form 1930 (Hazardous Waste Profile Sheet) for HW characterization prior to turn-in;
- Processing turn-in and disposal documentation for the generating activity when disposal of HW is authorized;
- Maintaining HW disposal records; and
- Obtaining funds for analysis, transportation, and disposal of hazardous waste.

Routine Inspections/Compliance Operations

- Performing HW management compliance surveys of BAFB;
- Developing and coordinating compliance with a BAFB Closure/Post-Closure Plan that addresses each IAP and the CAF;
- Ensuring that the BEE samples HW and arranges for the analysis of HW before it is accepted for storage/transport; and

- Conducting quarterly inspections of the CAF and IAPs. Taking remedial action as required.

Documentation and Record Keeping

- Signing HW manifests, and preparing HW reports and compliance documentation as required by EPA, SERC, LEPC, and Air Force instructions;
- Documenting inspections of the CAF and IAPs;
- Maintaining records for HW management surveys of BAFB;
- Maintaining HW documentation and correspondence for a minimum of 3 year; and
- Maintaining central HW training records for all base personnel.

HW Spill Response

- Providing spill response equipment at CAF and IAPs;
- Managing HW spill response team;
- Supervising HW spill response training;
- Acting as first responder at spill site; and
- Implementing remedial action in the event of a HW spill.

Other Responsibilities

- Preparing, reviewing, and biennially updating the BAFB HWMP, as required;
- Preparing and applying for HW permits;
- Providing technical training regarding hazardous waste labeling, storage, disposal, and record keeping;
- Supervising HW management training for all BAFB personnel requiring such training; and
- Requesting funds from the Accounting and Finance Officer (AFO), certifying fund availability for waste turned in to the Defense Reutilization and Marketing Office (DRMO), and reviewing billings received by the AFO for accuracy, requesting adjustments when necessary.

5.2.2 Bioenvironmental Engineering (BEE) Division

The BEE Division provides industrial hygiene/occupational health consultant services to all industrial shops and monitors hazardous materials processes for worker health and safety. Additionally, the BEE, in accordance with AFI 48-119, provides technical expertise on HW identification to BAFB and is responsible for the following:

HW Sampling

- Collecting (or assisting in collection of) samples for HW determination and forwarding samples to AL for analysis in accordance with the sampling and analytical requirements specified in EPA Publication SW-846 and the Waste Analysis Plan (WAP);
- Forwarding analytical results to CEV;
- Assisting BAFB generating activities in the interpretation of analytical results and preparation of DRMS Form 1930 (Hazardous Waste Profile Sheet); and
- Monitoring ground water, surface water, and drinking water for contamination.

Safety and Health Related Responsibilities

- Receiving and reviewing hazardous Material Safety Data Sheets (MSDS);
- Informing LS (Logistics Supply) of any special actions or assignments of issue exception codes;
- Specifying personal protective equipment (PPE) to be worn by personnel occupationally exposed to or who may otherwise manage HW; and
- Participating in HW training programs and exercises.

Other Responsibilities

- Maintaining and updating HW stream inventories; and
- Working with CEV to develop and update the BAFB HW Stream Inventory and Waste Analysis Plan (WAP).

5.2.3 Central Accumulation Facility (CAF) Manager/Supervisor

The CAF manager is responsible for the following:

- Ensuring all HW transported off-base is correctly labeled, marked, tagged, and weighed;
- Developing and following a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and for preventing, detecting, or responding to environmental or human health hazards;
- Maintaining the inspection schedule on file in the CEV office, Bldg 370. The schedule must identify problems (e.g. malfunctions or deterioration including bulging containers, leaking fittings, eroding dikes, etc.) identified during the inspection;
- Performing inspections at least weekly at the CAF;
- Maintaining weekly inspection records for a minimum of three years from the date of each inspection;
- Remedy any deterioration or malfunction of equipment or structures which the inspection reveals. Ensuring that the problem does not lead to an environmental or human health hazard;
- Taking precautions to prevent accidental ignition or reaction of ignitable or reactive materials;
- Maintaining required aisle space;
- Ensuring that an approved fire extinguisher is readily available if flammable HW is stored at the CAF;
- Keeping a CAF log for record of HW received at the facility. Log is updated for all HW until containers are turned into the HW disposal agent. Under no circumstances should a HW container be accepted at the CAF without there being a proper entry in the log;
- Contacting the transporter and/or the owner/operator of the HW disposal facility when a signed copy of the manifest is not received within 35 days of the date HW was accepted by the initial transporter per 40 CFR 262.42(a)1; and
- Submitting an Exception Report to the US EPA Region III administrator if a signed copy of the manifest is not received from the owner/operator of the designated facility within 45 days per 40 CFR 262.42(a)2.

5.2.4 Initial Accumulation Point (IAP) Manager/Supervisor

The IAP manager is responsible for the following:

HW Container Management

- Coordinating with CEV to ensure that HW is placed in a designated and approved location;
- Ensuring that HW is collected and stored in approved, appropriate containers. (Container approval coordinated through CEV);
- Performing IAP inspections. Inspections should be performed weekly for containers and daily for tanks;
- Maintaining HW containers in proper condition, e.g., no pitting, no sharp edges, creases or dents, no material defects, and no bulging heads;
- Ensuring that HW containers are kept closed except when they are being filled;
- Ensuring that containers are filled to only 90 percent capacity;
- Ensuring that HW is only placed in unmarked containers. Containers should be properly labeled prior to accumulating HW in them (see Section 10.3.2);
- Ensuring that the placement of a new HW container at the IAP is accompanied by a simultaneous entry of the placement in the accumulation site log;
- Ensuring that HW generated from the IAP is weighed for all disposal actions;
- Ensuring that the accumulation of hazardous waste at the IAP does not exceed 90 days;
- Notifying CEV when containers have been filled or when the accumulation start date reaches 50 days (which ever comes first); and
- Ensuring that HW is properly loaded and transported to the CAF. A representative of the generating activity must accompany the waste to the CAF.

Training

- Scheduling HW management training, including annual refresher training as appropriate, to personnel handling HW. IAP managers are responsible for scheduling new employee training.

Documentation

- Documenting employee training.
- Coordinating with CEV on personnel training requirements and providing documentation to CEV for central record keeping; and
- Maintaining weekly inspection records for a minimum of three years from the date of each inspection.

Other Responsibilities

- Remedy any deterioration or malfunction of equipment or structures which the inspection reveals. Ensure that the problem does not lead to an environmental or human health hazard;
- Ensuring the IAP has warning signs and is separate from work area;
- Ensuring IAP has appropriate spill/response kit and personnel are properly trained in their use; and
- Ensuring that an approved fire extinguisher is readily available if flammable HW is stored at the IAP.

5.2.5 Public Affairs Office (PAO)

The PAO is responsible for the following:

- Acting as the focal point for inquiries from the news media and concerned citizens regarding general HW questions and concerns, and for HW incidents or accidents; and
- Assisting the Installation Commander during situations involving HW incidents by keeping interested news media and the public aware of events and curtailing rumors through the dissemination of coordinated, accurate information.

5.2.6 Defense Reutilization and Marketing Office (DRMO)

DRMO office in Fort Meade, MD administers contracts for HW disposal service at BAFB. DRMO inspects HW disposal turn-in documents to ensure that all required disposal information is provided, including but not limited to proper HW characterization. DRMO provides blank DRMS 1930 forms to the HW generator and provides training for completing the form. DRMO initiates and monitors compliance with HW disposal contracts and maintains HW disposal documentation. Specifically, DRMO is responsible for the following:

- Providing guidance on turn-in procedures to BAFB personnel;
- Performing pre-inspections of HW at CAF before disposal;
- Ensuring that HW cargo is adequately secured and safe for transport before moving off-base;
- Overseeing contractor pickup of HW;
- Reviewing and signing all HW disposal documentation;
- Maintaining all hazardous waste documentation and correspondence for a minimum of 5 years;
- Forwarding a copy of the HW manifest to applicable agencies, as required;
- Conducting and documenting HW management training for all DRMO personnel;
- Forwarding records to CEV;
- Receiving paperwork for hazardous property and waste from CEV;
- Disposing of hazardous property by reutilization, resale, or service contract; and
- Forwarding certification of destruction/recycling to CEV.

5.2.7 Accounting and Finance Office (AFO)

The AFO Financial Manager obligates HW disposal funds based on a validated request (DoD Form 1348-1) from 11 CES Financial Management Element (CERF). AFO gets a billing statement for HW disposal services and forwards the bill to 11 CES/CERF for verification and approval. Upon receipt for the approved bill, AFO processes HW disposal payments using the military standard billing system.

5.2.8 Contracting Officer

In the event BAFB no longer maintains a contract with DRMO for HW disposal services the BAFB contracting officer will be responsible for the following:

- Ensuring all contracts having HW ramifications are administered in accordance with AFI 32-7042, DC Hazardous and Solid Waste Management Requirements, and AF Policy Letter, 6 June 1991 (Air Force Hazardous Waste Policy);
- Ensuring qualified HW disposal contractors (not just the low-price bidders) are awarded contracts; and

- Responding to BAFB customer requirements, specifications, and funding for contractual needs for HW collections, transportation, analyses, and disposal.

5.2.9 BAFB Tenants

DIA and NRL's Artificial Intelligence division are located at BAFB. DIA assumes full responsibility for managing its HW while stored at the facility IAP. After this point, it becomes the responsibility of CEV until its disposal off base. In addition, CEV is responsible for maintaining all HW records for the DIA facility.

NRL assumes total responsibility for the HW generated by Artificial Intelligence from point of generation to disposal. All HW generated by Artificial Intelligence is transferred to NRL's CAF for disposal. Currently, BAFB does not oversee NRL's HW management process. However, since both DIA and NRL generate and/or store HW at BAFB, they must be notified of and comply with all applicable portions of this HWMP. Tenant responsibilities include the following:

- Ensuring internal operating procedures are consistent with this HWMP;
- Assuring off-base activities are permitted;
- Conducting on-base activities in accordance with BAFB permit requirements; and
- Providing data to CEV for compliance with federal and D.C. reporting requirements.

5.2.10 Environmental Protection Committee (EPC)

AFR 19-8, Environmental Protection Committees and Environmental Reporting, established the EPC and assigns their responsibilities. The EPC assumes primary responsibility for reviewing and coordinating the HWMP, and for overseeing the base's compliance with all HWMP requirements.

The EPC chairperson reports on EPC activities to the installation commander at EPC meetings which occur once per quarter. The EPC is responsible for the following:

General Responsibilities

- Meeting as required but at least quarterly to evaluate environmental concerns raised by proposed Air Force actions and ensure these concerns are addressed in any decision making process;
- Reviewing and coordinating the BAFB HWMP;
- Reviewing summary data on waste generation and personnel exposure;

- Ensuring HW is properly disposed;
- Reviewing environmental policy, facilitates coordination, and serving as a steering group to monitor the overall conduct of the environmental protection program;
- Developing environmental awareness among members; and
- Reviewing status of BAFB progress on ECAMP corrective actions.

HQ USAF Level

- Ensuring 11th Wing has an operating pollution prevention plan and an active Environmental Compliance Assessment and Management Program (ECAMP);
- Reviewing the status of major environmental programs, issues, and initiatives;
- Preparing and/or providing input for environmental reports;
- Preparing and/or approving environmental planning documents;
- Reviewing and responding to the status of environmental compliance at BAFB. Gives specific attention to failure to meet compliance schedules with federal, state, and local regulatory agencies; and
- Reviewing the hazardous material and waste management program including the status of installation actions, to reduce and minimize the generation of hazardous waste.

Installation Level

- Reviewing and coordinating the hazardous material and hazardous waste programs including efforts to minimize the procurement, use, and disposal of such products;
- Reviewing at least biennially the HWMP;
- Reviewing the status of environmental permits; and
- Tracking and reviewing the installation ECAMP. Ensuring that corrective actions are taken and reporting status to the 11th Wing Vice Commander.

5.2.11 Installation Commander (IC)

The IC assumes ultimate responsibility for ensuring that all hazardous waste regulations as enforced by the EPA and the D.C. are implemented and followed by the base. Responsibilities include designating personnel to perform the following duties:

- Signing of all hazardous waste permits and manifests;
- Attending to enforced actions, if received;
- Ensuring that a HWMP is created and in place at the base; and
- Ensuring that all personnel receive the appropriate level of training before working with hazardous waste and receive refresher training as necessary.

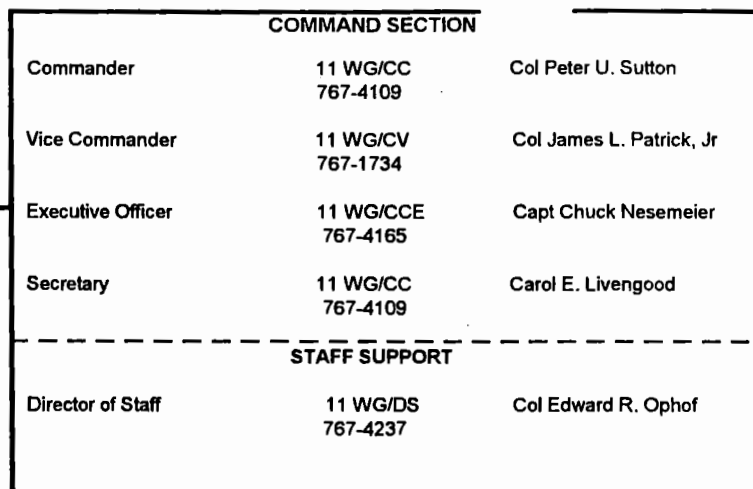
5.2.12 Individuals Assigned, Attached to, or Working at BAFB

Each individual assigned to, or working at BAFB is tasked to report any spill of oil or hazardous substance to the Base Fire Department and CEV and to take every reasonable precaution to prevent the spillage of oil and hazardous substances. In addition, all contractors performing services on-base will be notified prior to the initiation of the contract to take every reasonable precaution to prevent the spillage of oil or hazardous substances and to report any spills of this nature to the Base Fire Department and CEV.

CHAPTER 6

ORGANIZATION CHARTS

11th WING



Senior Enlisted Advisor
11 WG/CCC
CMSgt Petro
767-4398

Command Post
11 WG/CP
MSgt Riddick
404-4011

Multi-Purpose Facility
11 WG/CX
Mr Foote
404-7243

Equal Employment
11 WG/CCD
Ms Metcalf-Weinstein
767-0377

History
11 WG/HO
Dr Tucker
767-6500

Public Affairs
11 WG/PA
Ms Colthard
767-7581

Social Actions
11 WG/SA
Maj Avellaneda
767-4867

Safety
11 WG/SE
Mr Talbott
767-4324

Personnel
11 WG/DP
Lt Col Thomas
404-7238

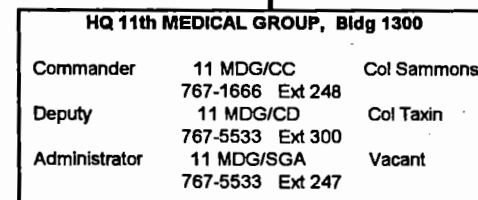
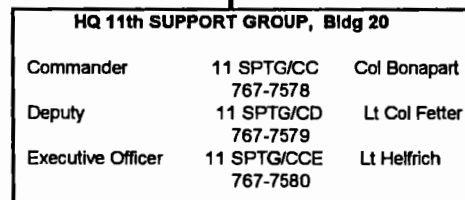
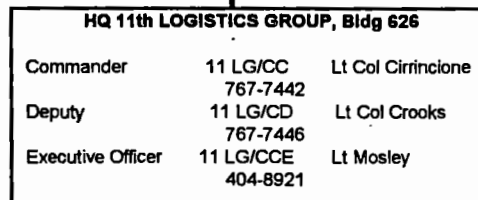
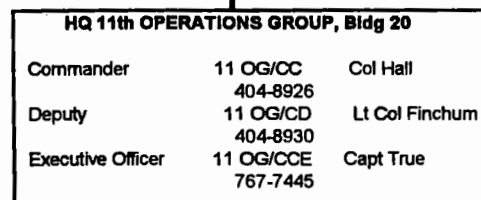
Comptroller
11 WG/FM
Mr Cava
695-6624

Chaplain
11 WG/HC
CH (Col) Schwartzman
767-5900

Inspector General
11 WG/IG
Col Oldenburg
404-8811

Judge Advocate
11 WG/JA
Col Schwartz
767-4772

Plans & Programs
11 WG/XP
Mr Calney
404-2347



USAF Band
USAF BA
Lt Col Graham
767-5255

Ceremonies & Protocol
11 OG/CCP
Lt Col Lopez
767-4265

Arlington Chaplaincy
11 OG/HC
CH (Col) Almond
695-4584

USAF Honor Guard
USAF HG
Maj Wood
404-7503

Contracting
11 LG/CC
Col Moore
767-7986

Supply
11 LGS/CC
Maj Collins
767-0880

Transportation
11 LGT/CC
Maj Reinert
433-0329

Civil Engineer
11 CES/CC
Lt Col Mayfield
767-5566

Mission Support
11 MSS/CC
Lt Col Russ
767-4401

Communications
11 CS/CC
Lt Col Murphy
767-5500

Security Forces
11 SFS/CC
Maj Freeman
767-5646

Services
11 SPTG/SV
Mr Milam
767-7707

Medical Support
11 MDSS/CC
Lt Col Alvarado
767-5532 ext 221

Medical Operations
11 MDOS/CC
Lt Col Taylor
767-5536 ext 211

Dental
11 DS/CC
Col Skinner
767-5402 ext 302

11 WG VA 33-2
OPR: HQ 11 WG/XPMP
Distribution: F
Date: 30 OCT 97
Supersedes 11 WG VA 37-2, 21 JUL 97
Contact HQ 11 WG/XPMP (404-2319)
with any changes as they occur.

CHAPTER 7

LOCATION MAPS

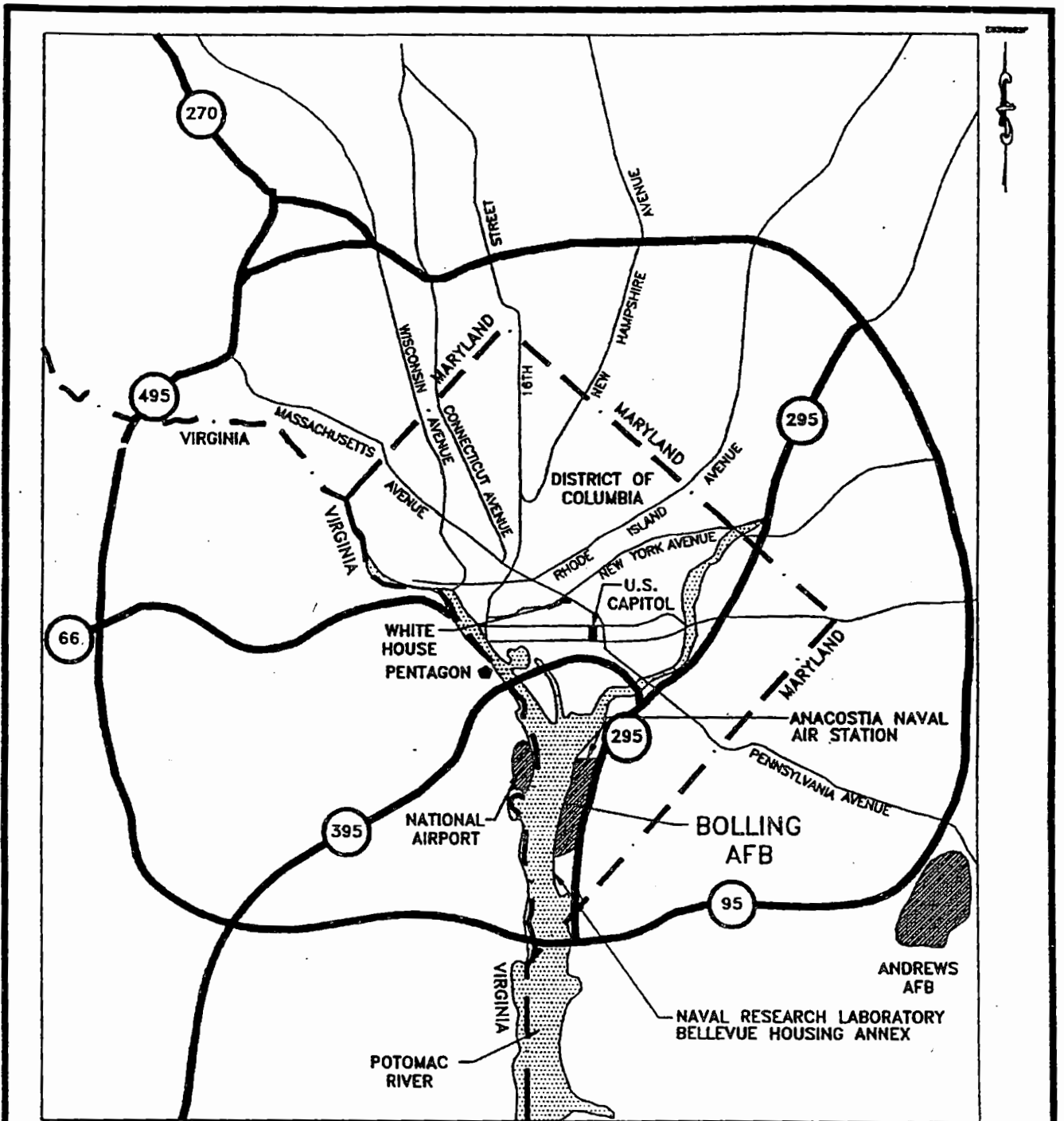


FIGURE 7-1
LOCATION MAP

SOURCE: MODIFIED FROM BAFB
COMPREHENSIVE PLAN, 1991

BOLLING AIR FORCE BASE
WASHINGTON, D.C.

8. HAZARDOUS WASTE INVENTORY

8.1 WASTE TRACKING METHODS

Currently, BAFB is utilizing a PC-based access database to track HW. CEV maintains a file copy of all HW manifests for tracking and reporting HW generation or other environmental information in order to comply with statutory, regulatory, and administrative requirements.

TABLE 8-1 HAZARDOUS WASTE PROCESS CODES

Hazardous Waste Process Codes		
Process	Wastes	Code
Abrasive Blasting	Grit, Paint, Chips, expanded media	AB
Aircraft Cleaning	Cleaning compounds	AC
Battery Ships	Battery acid, lead	BA
Biological Operations	Pesticides such as insecticides, herbicides, rodenticide, etc.	BO
Boiler Operations	Morpholine, nitrates	BL
Chemical Paint Stripping	Paint strippers, paint sludge	CP
Decarbonizers	Nitric acid, sulfuric acid, others	DE
Avionics/Electronics	Solvents	ER
Electroplating	Cleaning compounds, chromium, cyanide, tank sludges contaminated with heavy metals	EP
Expired Shelf Life	Expired shelf-life wastes--paints, solvents, cleaning materials, etc.	ES
Firefighting Operations	Aqueous film-forming foam (AFFF)	FF
Fluids Change-out/Purging	Oily waste, turbine oil, lube oil, hydraulic fluid, contaminated fuel, brake fluid, antifreeze, fluid-containing filters	FC
Industrial and Facility Maintenance	Cleaning supplies, mercury vapor lamp bulbs, PCBs	IM
Industrial Operations	Tool and machine wastes, cutting oils	IO
Installation Restoration	Waste from clean-up of installation restoration program sites	IR
Industrial Waste Treatment	Wastewater treatment sludge, chlorine	IW
Laboratory/NDI	Samples, test chemicals, penetrants	LA
Medical	Mercury, test chemicals, chemotherapeutic drugs	ME
Miscellaneous	Only wastes which cannot possibly be attributed to any other process listed	MS
Ordnance, demil/disposal	Explosive, pyrotechnic, propellant, lead contaminated water, soil or dust	OD
One-Time Only	Purging underground storage tank prior to replacement	OO
Oil Water Separators	Contaminated sludge, floating product	OS

TABLE 8-1 HAZARDOUS WASTE PROCESS CODES (Cont.)

Hazardous Waste Process Codes		
Process	Wastes	Code
Painting Operations	Paint, paint sludge, filters, surface preparation (solvents)	PO
Preservation and Packaging	Pentachlorophenol, copper arsenite	PP
Photo/X-ray	Fixer, developer	FX
Research and Development	Chemical testing, equipment testing	RD
Spill Clean-up	Absorbents, rags, contaminated soil	SC
Solvents/Degreasing	Cold cleaning solvents, PD 680, MEK	SO

Source: Air Force Pamphlet 32-7043

8.2 HAZARDOUS WASTE LOCATIONS

Table 8-2 identifies the locations at BAFB where HW is generated, accumulated, and/or stored. As HW is generated, it is accumulated in containers at IAPs at the shop, until it is transferred to the CAF located at Bldg 18. Although Artificial Intelligence generates HW at Building 256, this HW is managed by NRL.

8.3 RESPONSIBILITIES

BAFB should maintain a hazardous waste stream inventory for every hazardous waste stream generated on base. The BEE assumes responsibility for the BAFB hazardous waste stream inventory. BAFB will not handle, store, transport, dispose of, or inventory non-DoD owned hazardous waste or materials except as authorized. BAFB will ensure that all wastes are properly characterized and classified as either hazardous or non-hazardous waste in accordance with the BAFB Waste Analysis Plan (see Chapter 9 of this Plan). The BEE may obtain information concerning waste generating activities, EPA HW number, quantity of HW generated, waste characteristics and composition, and waste shipping information from the hazardous waste profile sheets to maintain and update the hazardous waste stream inventory.

Hazardous waste generating activities will identify and separately document wastes which are classified as non-hazardous due to the following:

- Subject to solid or hazardous waste exclusions (40 CFR 261.4).
- Recycled, not subject to generator waste determination requirements of 40 CFR 262.11.
- Land disposal restricted waste that is excluded from the definition of solid or hazardous waste or exempt from Subtitle C regulations under 40 CFR 261.2-261.6.

TABLE 8-2 BAFB HAZARDOUS WASTE LOCATIONS

Building Number	Organization
1	Civil Engineering (Bldg 371)
8	Auto Skills Center
17	Clinic Annex
18	Heat Plant (location of Central Accumulation Facility)
38	Entomology
41	Car Care Center
256	Artificial Intelligence Agency (NRL)
362	Transportation/Vehicle Maintenance
365	Gas Station
503	Supply Warehouse/Civil Engineering
518	Roads and Grounds Maintenance
520	497 Intel Group/INS
1300	Hospital Pharmacy/Dental Clinic
4472	Arts and Craft Center
6000	Defense Intelligence Agency (DIA) Center

The HW generating activity of an area generating an excluded, exempt, or recycled waste will place a one-time notice stating such generation, the subsequent exclusion from the definition of solid or hazardous waste or exemption from Subtitle C regulation, and the disposition of the waste in the generating activity's waste management file. A copy of the document must be forwarded to CEV.

HW such as Safety Kleen solvents and other tank waste is picked up by the HW disposal contractor at the IAP.

All documents forwarded to CEV are maintained on-site for at least five years from the date the waste was last sent to an off-site treatment, storage, or disposal facility (TSDF).

8.4 STATUS OF HAZARDOUS WASTE STREAM INVENTORY

BAFB presently operates as a LQG of HW. The base generates only a few major and consistent waste streams. The remaining wastes are slow generating and non-steady streams. Table 8-3 shows a hazardous waste stream inventory for the most consistent waste streams generated at BAFB. This inventory was compiled from BAFB's Annual Hazardous Waste Report for calendar year 1994 and contains for each waste stream; location of generator/IAP, estimated quantity disposed annually, associated EPA HW ID number, EPA Priority Pollutant No., type of container used for disposal, and disposal contract used. BAFB must ensure that this hazardous waste stream inventory is updated annually to include all waste streams regardless of the volume or frequency of generation. Refer to Table 8-4 for a list of the 17 EPA Priority Pollutants as cross-referenced in this table.

TABLE 8-3 HAZARDOUS WASTE STREAM INVENTORY

HAZARDOUS WASTE STREAM INVENTORY						
Date: September 1995 Installation:		Bolling Air Force Base		Organization Code: CEV (Environmental Flight)		
Waste Stream Location (Shop/Bldg)	Waste Stream	Estimated Quantity Disposed (lbs/year)	EPA/State HW ID Number	EPA Priority Pollutant Number	Disposal Container	Disposal Method
Bldg 371	Waste lead-acid batteries UN 2794	400	D002, D008	8	Drum	DRMO
	Waste poisons solid (amitiole) UN 2811	55	V011, F002	N/A	Variable	DRMO
	Waste lithium battery UN 3090	350	D001, D003	N/A	Variable	DRMO
Bldg 17	Waste mercury UN 2809	8630	D009	9	Drum	DRMO
	RQ waste mercury/water UN 3082	1700	D009	9	Drum	DRMO
	RQ waste mercury UN 2809	17	D009	9	Drum	DRMO
Bldg 362	RQ waste flammable material UN 1993	9455	D001	N/A	Drum	DRMO
	Waste poisonous liquids (oil w/NA 2810 1,1,1	225	F002	N/A	Drum	DRMO

HAZARDOUS WASTE STREAM INVENTORY

HAZARDOUS WASTE STREAM INVENTORY						
Date: September 1995 Installation:		Bolling Air Force Base		Organization Code: CEV (Environmental Flight)		
Waste Stream Location (Shop/Bldg)	Waste Stream	Estimated Quantity Disposed (lbs/year)	EPA/State HW ID Number	EPA Priority Pollutant Number	Disposal Container	Disposal Method
	trichloroethane)					
Bldg 362	Waste solid (debris w/tetrachloroethylene) UN 3077	30	F002, D039	N/A	Drum	DRMO
Bldg 503	Waste paint related material, N.O.S., 3, UN 1263	7100	D001	11,14,17	Drum	Contractor (Clean Harbors)
	RQ waste corrosive liquids, N.O.S., 8, UN 1760	600	D002	N/A	Drums	Contractor (Clean Harbors)
	Waste combustible liquid, N.O.S., NA 1993	600	MA01	N/A	Drums	Contractor (Safety Kleen)
	Waste combustible liquid N.O.S. (Petroleum Naphtha) NA1993	772	D001, D006, D008, D018, D035, D039, D040	N/A	Drum	Contractor (Safety Kleen)
Bldg 518	RQ waste flammable material UN 1993	9455	D001	N/A	Drum	DRMO
	RQ waste NiCad w/water	960	D006	2	Drum	DRMO

HAZARDOUS WASTE STREAM INVENTORY						
Date: September 1995 Installation:		Bolling Air Force Base		Organization Code: CEV (Environmental Flight)		
Waste Stream Location (Shop/Bldg)	Waste Stream	Estimated Quantity Disposed (lbs/year)	EPA/State HW ID Number	EPA Priority Pollutant Number	Disposal Container	Disposal Method
	UN 3082					
Bldg 518	Waste flammable liquid (kerosene/gasoline)	40	D001, D008	1	Variable	DRMO
Bldg 6000	RQ waste methylene chloride NA 3077	10	F002	N/A	Drum	DRMO
	Waste fluorescent tubes NA 3077	885	D009	N/A	Cylinder	DRMO
	Waste sodium hydroxide SOL UN 1824	600	D002	N/A	Drum	DRMO
	Waste tetrachloroethylene, 6-1 UN 1897	13	U210	N/A	Drum	DRMO
	Waste dieldrin, NA 2761	110	D027	N/A	Drum	DRMO
	Waste zinc phosphide, UN 1714	1	D002, P122	N/A	Drum	DRMO
	Waste poisons liquid (methylene chloride w/tetrachloroethylene)	13	V080	N/A	Variable	DRMO
	Waste RQ (silver-oxide)					

HAZARDOUS WASTE STREAM INVENTORY

HAZARDOUS WASTE STREAM INVENTORY						
Date: September 1995 Installation:		Bolling Air Force Base		Organization Code: CEV (Environmental Flight)		
Waste Stream Location (Shop/Bldg)	Waste Stream	Estimated Quantity Disposed (lbs/year)	EPA/State HW ID Number	EPA Priority Pollutant Number	Disposal Container	Disposal Method
	UN 3077	2	D011	N/A	Variable	DRMO
Bldg 6000	Waste poisons liquid (chloroform) UN 2810	51	U044, U080	N/A	Variable	DRMO
	Waste poisons solid, UN 2811	20	D039, F002	N/A	Variable	DRMO
Basewide	Waste flammable material UN 1993	845	D001	N/A	Drum	DRMO
	RQ waste battery dry w/potassium UN 3028	40	D006	N/A	Drum	DRMO
	RQ waste poisonous Nos.6-1 UN 2810	345	F002	N/A	Drum	DRMO
	Waste anhydrous liquid ammonia	1610	D002/D003	N/A	Cylinder	DRMO
	Waste aerosols, UN 1950	21	D040	N/A	Drum	DRMO
	Waste aerosols, UN 1950	7	U226	N/A	Drum	DRMO
	Waste aerosols, UN 1950	46	D001	N/A	Drum	DRMO
	Waste corrosive material,	194	D002	N/A	Variable	DRMO

Final
January 1998

HAZARDOUS WASTE STREAM INVENTORY						
Date: September 1995 Installation:		Bolling Air Force Base		Organization Code: CEV (Environmental Flight)		
Waste Stream Location (Shop/Bldg)	Waste Stream	Estimated Quantity Disposed (lbs/year)	EPA/State HW ID Number	EPA Priority Pollutant Number	Disposal Container	Disposal Method
	UN 1759					
Basewide	Waste oxidizing sub. UN 319	65	D001, D007	N/A	Variable	DRMO
	RQ waste battery wet w/alkali	940	D002, D006	N/A	Drum	DRMO

TABLE 8-4 EPA PRIORITY POLLUTANTS

EPA Priority Pollutants		
Priority Pollutant	Typical Air Force Use	ID Number
Benzene	Fuels	1
Cadmium and compounds	Plating for corrosion control	2
Carbon Tetrachloride	Bearing cleaning, PMEL	3
Chloroform	Bearing shop, laboratories	4
Chromium and compounds	Plating and paints	5
Cyanides	Plating solutions	6
Dichloromethane	Cold wipedown cleaner	7
Lead and compounds	Batteries, paint, solder	8
Mercury and compounds	Laboratories	9
Methyl Ethyl Ketone	Degreaser/cleaner, aircraft	10
Methyl Isobutyl Ketone	Paints	11
Nickel and compounds	Plating for corrosion control	12
Perchloroethylene	Degreaser	13
Toluene	Paints	14
Trichloroethane	Parts cleaning, propellants	15
Trichlorethylene	Degreaser, parts cleaning	16
Xylene	Paints	17

Source: Air Force Pamphlet 32-7043

9. WASTE ANALYSIS PLAN

9.1 BACKGROUND INFORMATION

9.1.1 Federal and State Requirements

The Waste Analysis Plan (WAP) is required by 40 CFR 264.13(a), (b), and (c), 40 CFR 268.7, 40 CFR 270.14(b)(5), and Air Force Policy 32-7042, and 32-7043. The WAP complies with federal and D.C. RCRA 20A DCMR 40-54 requirements and applies to all BAFB hazardous waste streams that are transferred to the CAF, Building 18.

9.1.2 Waste Analysis Plan Contents

The WAP contains base procedures for identifying and evaluating HW streams, and instructions on completing DRMS Form 1930 (Hazardous Waste Profile Sheet).

The WAP describes detailed procedures for obtaining physical and chemical analyses from waste generated from activities at BAFB. Additionally, the WAP addresses the following:

- a. Waste Identification
- b. Waste Description
- c. Waste Parameter Selection
- d. Waste Documentation
- e. Sample Request Procedures

9.2 HAZARDOUS WASTE CHARACTERIZATION PROCESS

The BAFB HW characterization process involves three sequential steps:

1. Identification
2. Description
3. Quantification

Figure 9-1 displays the Air Force and regulatory waste characterization processes.

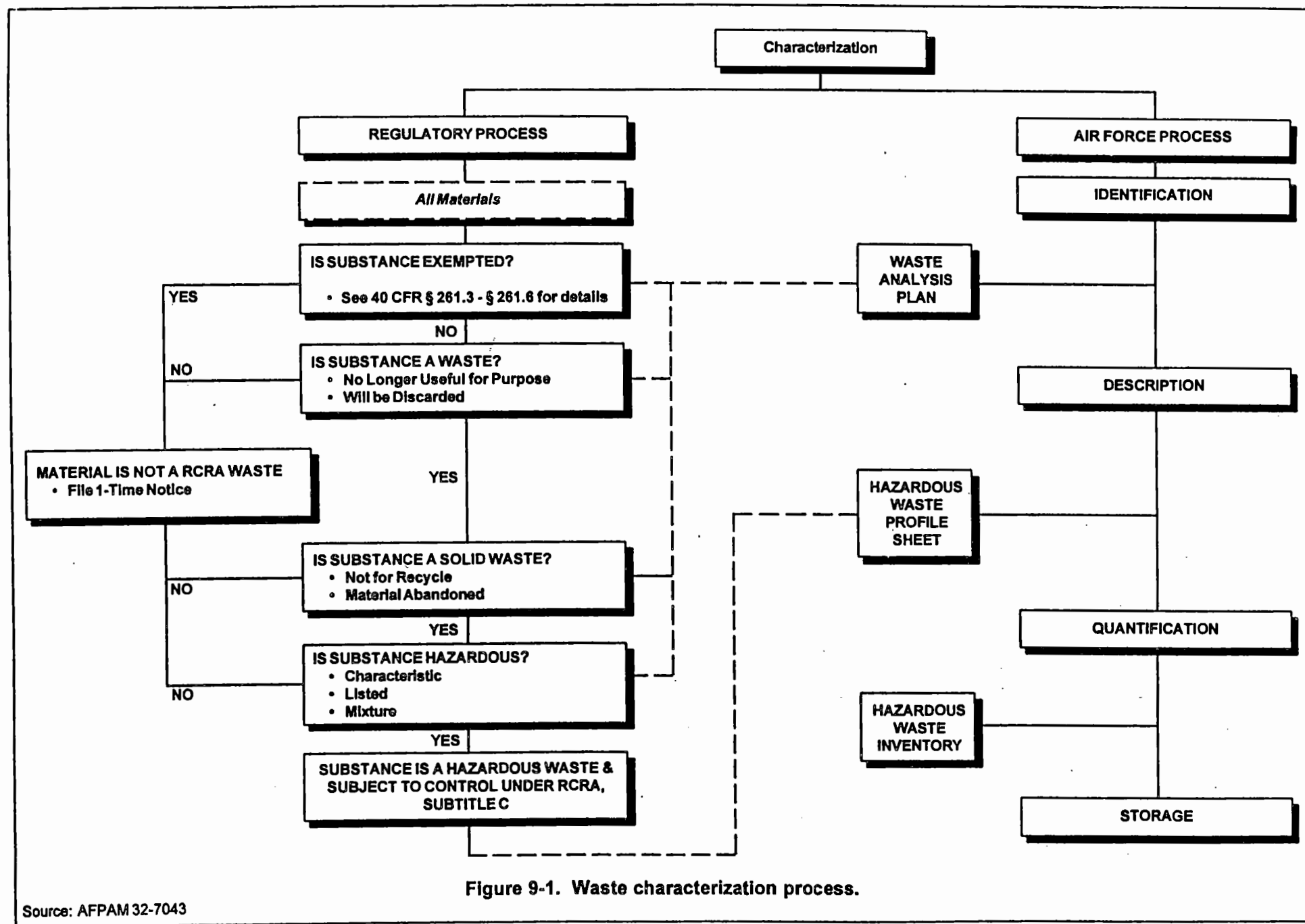


Figure 9-1. Waste characterization process.

9.2.1 Waste Identification

Waste identification is a process in which newly generated or unknown wastes at BAFB are evaluated to determine whether the waste should be categorized as hazardous or non-hazardous. Waste identification is conducted by using the waste generator's knowledge or by analytical testing. Either way of evaluating the waste should be based on EPA solid waste or HW definitions (40 CFR 261.2 and 40 CFR 262.3).

The majority of HW generated at BAFB is from low-volume waste streams. According to the 6 June 1991 Air Force Hazardous Waste Policy, the frequency of analytical testing that is required is differentiated by the following characterization of high volume and low volume waste streams:

High-Volume: High-volume waste streams generate four or more 55-gal drums of waste per year. High-volume waste streams require annual analytical testing after initial analytical characterization.

Low-Volume: Low-volume waste streams generate three or fewer 55-gal drums of waste per year. Low-volume waste streams require reevaluation every three years unless a process change dictates more frequent evaluation. Low-volume waste streams may be reevaluated using user knowledge after the initial analytical characterization.

Analytical characterization is required for waste streams which are chemical mixtures. However, testing is not normally required for unused, waste commercial cleaning products or laboratory chemicals in their original, marked containers.

CEV determines if the waste generator's knowledge is sufficient for waste characterization. The generating activity should request a HW determination from CEV. If CEV is unable to determine if a waste stream is hazardous, CEV should notify the BEE. The BEE will sample (or assist in the collection of) the waste stream and arrange for analysis through AL. Sampling and analysis should be conducted in accordance with the requirements of this WAP and the requirements specified in EPA publication SW-846 (Test Methods for Evaluating Solid Waste).

The waste generating activity should ask the following questions to determine if the waste requires further evaluation:

1. **Is it a waste?**

If the answer to any of the following four questions is yes then the material is a waste.

- a. Is the material no longer useful for its intended purpose because it is dirty, out of specification, or a spill residue?
- b. Is it an unintended or unusable byproduct?

- c. Does the base intend to discard the material for eventual treatment, storage, recycling, or disposal?
 - d. Is it produced by cleanup at a previously uncontrolled waste site?
2. **Is it a solid waste?**

A solid waste is generally defined as any discarded material (including solids, liquids, and containerized gases) which is abandoned, recycled, or considered inherently waste-like.

3. **Is it a hazardous waste?**

If the material is a solid waste, the solid waste must be evaluated to determine if it is a HW. A material is a HW if it has not been excluded from regulation and is a characteristic HW (e.g., ignitable, corrosive, reactive, or toxic), a listed HW, or a mixture of a listed HW and solid waste. This evaluation can be conducted by either using the waste generator's knowledge of the hazardous characteristics of the waste in light of the material or processes used, by reviewing and comparing the waste to listed HW, or by analytical testing as described in the WAP and 40 CFR 261 and 20 A DCRM 41. Records from test results must be kept by CEV for a minimum of 3 years.

9.2.2 Waste Description

Analytical results need to be interpreted to determine if the HW is hazardous according to 40 CFR 261. The BEE is responsible for interpreting analytical results. The BEE should mark the test results as "HAZARDOUS WASTE" or "NON HAZARDOUS WASTE" after making the determination. The generating activity uses the analytical results and its process knowledge to complete DRMS Form 1930.

9.2.3 Waste Quantification

A final step in the waste characterization process is a determination of the amount of HW generated each year. The IAP manager is responsible for using accumulation site logs to quantify all HW streams. This information is documented on both the HW Profile Sheet (Chapter 9) which is completed by the IAP manager, and the HW stream inventory (Chapter 8) which is completed by the BEE.

9.3 HAZARDOUS WASTE SAMPLING

There are several IAP HW generators at BAFB (see Table 8-3). In addition to the regular waste streams that are generated, random one time or expired shelf-life HW may also be generated. In the event that a new HW stream develops at BAFB, the new stream should be sampled by the BEE as soon as the HW is generated and prior to the HW leaving the generating area.

Chemical analysis will normally be required for all waste streams having chemical mixtures. Routine sample analysis should be initiated by the BEE. Any non-routine (unknown drum contents, demolition, abatements, etc.) sampling requests are made to the BEE by CEV.

9.3.1 Sampling Location and Frequency

The BEE generates chain-of-custody documentation to track environmental sampling performed at BAFB. Sampling requirements and frequency are as follows:

1. RCRA Sampling: The BEE should perform sampling at CAF to monitor HW operations. Low-volume wastes must be analyzed every 3 years unless there has been a process change that would dictate a more frequent evaluation. High-volume waste streams require annual sampling.
2. Demolition: The BEE is required to collect environmental samples to document the presence of HW during demolition of any BAFB structure. Sample collection is performed as needed.
3. Spill Response: The BEE is required to sample for level of contamination in the event of a large spill of oil or hazardous material, and/or level of cleanliness after completion of spill response. Sample collection is performed as needed.
4. Abatement: The BEE is required to perform HW sampling at locations where HW abatement will be and has been performed. Sample collection is performed as needed.
5. Unknown Waste: The BEE is required to perform sampling to determine the nature of an unknown waste. Sample collection is performed as needed.
6. Quality Assurance/Quality Control (QA/QC): QA/QC sampling is required to monitor the accuracy/quality of laboratory analysis and to re-characterize a waste stream if the waste stream undergoes substantial change.

9.3.2 Sampling Methods

All waste samples will be collected in accordance with procedures specified in this WAP and sampled in accordance with EPA-specified procedures identified in Table 9-1 to ensure that they are appropriate for the waste.

TABLE 9-1 SAMPLING METHOD PROTOCOLS

Sample Type	Sample Method
Extremely viscous liquids	ASTM Standard D140-70
Crushed or powdered material	ASTM Standard D346-75
Soil or rock-like material	ASTM Standard D420-69
Soil-like material	ASTM D1452-65
Fly ash-like material	ASTM Standard D2234-76
Containerized liquid wastes	EPA SW-846 COLIWASA Procedure
Liquid waste in pits, ponds, lagoons and similarly reservoirs	EPA SW-846 Pond Sampler

9.3.3 Sampling Procedures

- a. Both sampling equipment and sample bottles must be clean as a means of preventing sample contamination.
 1. Sample bottles intended for holding samples which will be analyzed for metals must be cleaned with detergent, rinsed with tap water, rinsed with 1:1 nitric acid, rinsed with tap water, rinsed with 1:1 hydrochloric acid, rinsed with tap water, and finally rinsed with Type II deionized water.
 2. Sample bottles intended for holding samples which will be analyzed for organic compounds must be washed with detergent, rinsed with tap water, rinsed with distilled, deionized water, and dried at 105 °C for approximately 1 hour.
- b. Sample bottles intended for holding samples which are to be analyzed for volatiles must be placed in a cooler with ice for storage and shipping to ensure that they are cooled down to 4 °C.
- c. Sampling equipment must be decontaminated prior to use and reuse by washing in a detergent solution and rinsing. Disposable sampling equipment (e.g., disposable COLIWASAs) will be used and disposed of after each sample is collected.

- d. Personnel collecting HW samples must wear PPE including impervious gloves, chemical safety goggles, coveralls, and suitable boots when sampling HW. The BEE should be contacted to determine the proper equipment to be worn when sampling specific waste streams. A minimum of Level B protection (e.g., chemical splash suit, impervious gloves, impervious outer boots, and a positive pressure self-contained breathing apparatus) must be worn when sampling unknown wastes.

9.3.4 Documentation

The BEE utilizes sample labels, analysis request forms (Table 9-2), and when required Chain-of-Custody (COC) forms for waste sample delivery to AL. The possession and handling of samples is recorded on the analysis request forms and is traceable from collection through analysis, and upon final disposition.

TABLE 9-2 ANALYSIS REQUEST FORMS

Form Number	Form Name
AF Form 2750	Industrial Hygiene Sampling Data
AF Form 2751	Bulk Material Sampling Data
AF Form 2752A	Environmental Sampling Data
AF Form 2752B	Environmental Sampling Data (Trace Organics)
AF Form 2753	Radiological Sampling Data

Sample labels are filled out by the BEE at the time of sample collection and placed on sample containers prior to sampling. Figure 9-2 depicts an example sample label. Necessary information on a sample label includes the sample number, name of the collector, date and time of collection, and collection location.

Collector	_____
Sample Number	_____
Place of Collection	_____
Date Sampled	_____
Time Sampled	_____
Field Information	_____

Figure 9-2 Waste Sample Collection Label

9.4 ANALYTICAL

9.4.1 Waste Parameter Selection

Initial testing for determination of waste characteristics is required for all waste streams determined by the BEE as potentially hazardous. The BEE shall determine the appropriate test methods for each waste stream by conducting the following:

1. Analysis of product MSDS information.
2. Inspection of processes that generate waste.
3. Analysis of potentially hazardous reactions/or mixtures.

9.4.2 Analytical Methods

All test methods must comply with the analytical testing methods referenced in 40 CFR 260 and 261. Analytical testing is performed by AL at Brooks AFB. AL is accredited by the American Association of Laboratory Accreditation for the analysis of wastewater, HW, Superfund site, underground injection, and underground storage tank program samples.

9.5 HAZARDOUS WASTE PROFILE SHEET

Upon receipt of analytical results, the BEE should evaluate the data to determine if the material is a HW and to ensure compliance with the WAP. The BEE should interpret the results for the waste generator, provide a copy of the results to the waste generator, CEV, and a file copy. The BEE or CEV should maintain the copy in an active file on base for a minimum of 3 years. After 3 years files may be pulled and archived.

The IAP manager uses analytical results and/or user knowledge to complete a comprehensive waste stream description which is recorded on the HW Profile Sheet. Analytical results from waste evaluation activities should be attached to the DRMS Form 1930.

The DRMS Form 1930 is presented as Figure 9-3. Instructions for completing the DRMS Form 1930 are portrayed as Figure 9-4. The DRMS Form 1930 is the standard form which must be used for characterizing HW for all disposal actions. DRMS Form 1930s can be obtained from the DRMO office at Fort Meade, and should also be made available from the BEE or CEV.

IAP managers and other generating activities can obtain support on completing the HW Profile Sheet as follows:

1. The HW disposal contractor or CEV will advise on completion of Part I and is responsible for completing information required regarding EPA land disposal restrictions on the HW Profile Sheet. CEV is responsible for reviewing the HW Profile Sheet for accuracy based on the best available information.
2. The BEE or CEV completes the health and HW identification portions in Part II, Sections 1-4 and the special handling information in Section 5. If requested by CEV, the BEE may also review the Hazardous Waste Profile Sheet for accuracy. It is also standard practice for DRMO to review the HW Profile Sheet for technical accuracy when they pre-inspect the waste in preparation for disposal. The BEE and CEV should maintain a copy of each HW Profile Sheet for a minimum of 3 years.
3. DRMO will advise on completion of the proper shipping information, containers, and transportation requirements of Part II, Section 5.
4. The generating activity is responsible for completing Section 6 and attaching a copy of all Material Safety Data Sheets (MSDSs) or identifying the locations and national stock numbers for all chemicals that are known to be in the waste stream.
5. The generating activity must submit an updated HW Profile Sheet to DRMO for each container of HW turned-in for disposal by 1 December of each year or whenever the waste stream changes regardless of when the waste stream was last analyzed. In the event that more than one container of the same waste exists, then one HW Profile Sheet will be completed for the group.

9.6 WASTE ANALYSIS PLAN (WAP) REVISION

The BAFB WAP will be evaluated and reviewed annually by the BEE and CEV to ensure that the most up-to-date procedures are conducted. The WAP will also be reviewed and revised whenever:

1. Sampling frequencies change due to annual volume of HW streams.
2. Analytical parameters change due to changes in the process generating HW.
3. EPA HW identification numbers change due to regulatory revisions.
4. Disposal methods change due to revisions to land disposal restriction or changes in disposal contracts.

HAZARDOUS WASTE PROFILE SHEET

PART I

A. GENERAL INFORMATION

WASTE PROFILE NO. _____

1. GENERATOR NAME

2. FACILITY ADDRESS

3. GENERATOR USEPA ID

4. GENERATOR STATE ID

5. ZIP CODE

6. TECHNICAL CONTACT

7. TITLE

PHONE
()

B. 1. NAME OF WASTE

2. USEPA/or/STATE WASTE CODE(s) _____ 3.

PROCESS GENERATING WASTE _____ 4.

PROJECTED ANNUAL VOLUME/UNITS _____ / _____ 5. MODE OF COLLECTION _____

6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN 40CFR261.31 (e.g., F020, F021, F022, F023, F025, F027, OR F028)? ☐ YES ☐ NO7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (40CFR268)? ☐ YES ☐ NOHAS AN EXEMPTION BEEN GRANTED? ☐ YES ☐ NODOES THE WASTE MEET APPLICABLE TREATMENT STANDARDS ☐ YES ☐ NO REFERENCE STANDARDS _____

PART II

1. MATERIAL CHARACTERIZATION

(OPTIONAL - NOT REQUIRED DATA)

COLOR _____

DENSITY _____ BTU/LB _____

TOTAL SOLIDS _____ ASH CONTENT _____

AYERING: ☐ MULTILAYERED ☐ BILAYERED ☐ SINGLE PHASE

4. MATERIAL COMPOSITION

COMPONENT CONCENTRATION RANGE

TOTAL 100%

2. RCRA CHARACTERISTICS

PHYSICAL STATE: ☐ SOLID ☐ LIQUID☐ SEMI-SOLID ☐ GAS ☐ OTHERTREATMENT GROUP: ☐ WASTEWATER ☐ NON-WASTEWATER☐ IGNITABLE (D001)☐ REACTIVE (D003)

FLASH POINT (F) _____

☐ WATER REACTIVE☐ HIGH TOC (>10%)☐ CYANIDE REACTIVE☐ LOW TOC (<10%)☐ SULFIDE REACTIVE☐ CORROSIVE (D002)☐ TOXICITY CHARACTERISTIC

pH _____ (SEE REVERSE FOR LISTING)

☐ CORRODES STEEL

5. SHIPPING INFORMATION

DOT HAZARDOUS MATERIAL ☐ YES ☐ NO

PROPER SHIPPING NAME _____

HAZARD CLASS _____ U.N. or N.A. NO. _____

ADDITIONAL DESCRIPTION _____

METHOD OF SHIPMENT ☐ BULK ☐ DRUM ☐ OTHER: _____

CERCLA REPORTABLE QUANTITY (RQ) _____

EMERGENCY RESPONSE GUIDE PAGE _____

DOT PUBLICATION 5800.4 PAGE NO. _____ EDITION (YR) _____

SPECIAL HANDLING INFORMATION _____

3. CHEMICAL COMPOSITION (ppm or mg/L)

COPPER _____ PHENOLICS _____

NICKEL _____ TOTAL HALOGENS _____ ZINC _____

_____ VOLATILE ORGANICS _____

CHROMIUM-HEX _____ PCBs _____

(OTHER) _____

NOTE:
EXPLOSIVES, SHOCK SENSITIVE, PYROPHORIC, RADIOACTIVE, AND ETIOLOGICAL WASTE NORMALLY ARE NOT ACCEPTED BY THE DRMO.

6. GENERATOR CERTIFICATION

BASIS FOR INFORMATION

☐ CHEMICAL ANALYSIS (ATTACH TEST RESULTS)☐ USER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS - Explain how and why these documents comply with

RCRA requirements) _____ I, _____

(Print or Type Name) _____, HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS

IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THE WASTE TURNED IN TO THE DRMO. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

SIGNATURE OF GENERATOR'S REPRESENTATIVE

DATE

Figure 9-3 Hazardous Waste Profile Sheet

TOXICITY CHARACTERISTICS LIST

**EFFECTIVE 25 SEP 90 - LARGE QUANTITY GENERATORS
29 MAR 91 - SMALL QUANTITY GENERATORS**

CONTAMINANT	EPA HW No.	(mg/L)	CONTAMINANT	EPA HW No.	(mg/L)
<input type="checkbox"/> ARSENIC	D004	_____	<input type="checkbox"/> HEXACHLORO-1,3-BUTADIENE	D033	_____
<input type="checkbox"/> BARIUM	D005	_____	<input type="checkbox"/> HEXACHLOROETHANE	D034	_____
<input type="checkbox"/> BENZENE	D018	_____	<input type="checkbox"/> LEAD	D008	_____
<input type="checkbox"/> CADMIUM	D006	_____	<input type="checkbox"/> LINDANE	D013	_____
<input type="checkbox"/> CARBON TETRACHLORIDE	D019	_____	<input type="checkbox"/> MERCURY	D009	_____
<input type="checkbox"/> CHLORDANE	D020	_____	<input type="checkbox"/> METHOXYCHLOR	D014	_____
<input type="checkbox"/> CHLOROBENZENE	D021	_____	<input type="checkbox"/> METHYL ETHYL KETONE	D035	_____
<input type="checkbox"/> CHLOROFORM	D022	_____	<input type="checkbox"/> NITROBENZENE	D036	_____
<input type="checkbox"/> CHROMIUM	D007	_____	<input type="checkbox"/> PENTACHLOROPHENOL	D037	_____
<input type="checkbox"/> O-CRESOL	D023	_____	<input type="checkbox"/> PYRIDINE	D038	_____
<input type="checkbox"/> M-CRESOL	D024	_____	<input type="checkbox"/> SELENIUM	D010	_____
<input type="checkbox"/> P-CRESOL	D025	_____	<input type="checkbox"/> SILVER	D011	_____
<input type="checkbox"/> CRESOL	D026	_____	<input type="checkbox"/> TETRACHLOROETHYLENE	D039	_____
<input type="checkbox"/> 2,4-D	D016	_____	<input type="checkbox"/> TOXOPHENE	D015	_____
<input type="checkbox"/> 1,4-DICHLOROBENZENE	D027	_____	<input type="checkbox"/> TRICHLOROETHYLENE	D040	_____
<input type="checkbox"/> 1,2-DICHLOROETHANE	D028	_____	<input type="checkbox"/> 2,4,5-TRICHLOROPHENOL	D041	_____
<input type="checkbox"/> 1,1-DICHLOROETHYLENE	D029	_____	<input type="checkbox"/> 2,4,6-TRICHLOROPHENOL	D042	_____
<input type="checkbox"/> 2,4-DINITROTOLUENE	D030	_____	<input type="checkbox"/> 2,45-TP (SILVEX)	D017	_____
<input type="checkbox"/> ENDRIN	D012	_____	<input type="checkbox"/> VINYL CHLORIDE	D043	_____
<input type="checkbox"/> HEPTACHLOR (AND ITS HYDROXIDE)	D031	_____			
<input type="checkbox"/> HEXACHLOROBENZENE	D032	_____			

PART III

FOR DRMO USE ONLY

DRMO VERIFICATION

1. DATE VERIFIED _____

2. RESULTS ☐ **ATTACHED**

pH _____ **FLASH POINT** _____ **SPECIFIC GRAVITY** _____ **HALIDES (TOX)** _____

REACTIVITY: WATER REACTIVITY _____ **CYANIDES** _____ **SULFIDES** _____

TCLP _____

Figure 9-3 (Cont.)

PART I

A. GENERAL INFORMATION

1. GENERATOR NAME - Enter the name of the generating facility.
2. FACILITY ADDRESS - Enter the street address of the generating facility.
3. GENERATOR USEPA ID - Enter the 12-character alpha-numeric descriptor issued by the USEPA to the facility generating the waste.
4. GENERATOR STATE ID - Enter the descriptor issued by the state to the facility generating the waste (if applicable).
5. ZIP CODE - Enter the generating facility's five or nine digit zip code.
6. TECHNICAL CONTACT - Enter the name of a person who will answer technical questions about the waste.
7. TITLE - Enter technical contact's title.
8. PHONE - Enter technical contact's telephone number.

B.

1. NAME OF WASTE - Enter the name that is generally descriptive of this waste (e.g., paint sludge, PCB-contaminated dirt, cyanide plating waste).
2. USEPA/OR STATE WASTE CODES(s) - Indicate the appropriate state or USEPA Hazardous Waste Identification Number (e.g., D001 U119, etc.).
3. PROCESS GENERATING WASTE - List the specific process/operation or source that generates the waste (e.g., paint spray booth, PCB spill, metal plating operation).
4. PROJECTED ANNUAL VOLUME/UNITS - Enter the amount of this waste which will be generated annually. Use appropriate units to describe this volume (e.g., pounds).
5. MODE OF COLLECTION - Describe the method utilized to collect and store the waste stream (e.g., drums, tanks, ponds).
6. DIOXIN WASTE - Storage and disposal of Dioxin wastes require special attention. If this waste is a USEPA listed Dioxin waste, indicate "YES" and contact your DRMO representative.
7. LAND DISPOSAL RESTRICTIONS - Indicate if the waste has been prohibited from land disposal, has received an exemption under 268.8 or meets the applicable treatment standards.

PART II

1. MATERIAL CHARACTERIZATION (OPTIONAL - NOT REQUIRED DATA)

COLOR - Describe the color of the waste (e.g., blue, clear, varies).

DENSITY - Indicate the range. The specific gravity of water is 1.0. Most organics are less than 1.0. Chlorinated solvents, most inorganics and paint sludge are greater than 1.0.

BTU/LB - This entry is only required for property that may have potential for use as a fuel substitute.

ASH CONTENT - This entry only for used oil with recovery potential.

TOTAL SOLIDS - Content can be expressed as either a weight percentage or dry weight concentration (mg/kg).

LAYERING - Check all applicable boxes. Multi-layered means more than two layers (e.g., oil/water/sludge).

Bi-layered means the waste is comprised of two layers which may or may not be of the same phase (e.g., oil/water, solvent/sludge). Single phased means the waste is homogenous.

2. RCRA CHARACTERISTICS (40CFR261)

PHYSICAL STATE - If the four boxes provided do not apply, a descriptive phrase may be entered after "Other".

TREATMENT GROUP - Check the box which applies to the correct treatment group.

IGNITABLE - Indicate if the waste is ignitable (D001) and list its liquid flash point obtained using the

INSTRUCTIONS (Cont.)

appropriate testing method (40CFR261.21). The flash point is important from a transportation standpoint (49CFR173.115). Also list if this waste is considered to be a HIGH TOC IGNITABLE (contains GE: 10% total organic carbon) or a LOW TOC IGNITABLE (contains LT: 10% TOC). Knowledge of high/low TOC is required due to Third Land Ban regulations. Solids with flammable potential should be identified in PART 3 (e.g., Pyrophoric, RCRA Reactive, other).

CORROSIVE - Indicate if the waste is corrosive (D002) and its pH for liquid or liquid portions of the waste. Also indicate if this waste corrodes steel (40CFR261.22). For solid or organic liquid wastes, indicate the pH of a 10% aqueous solution of the waste if applicable. Write "NA" for nonwater soluble materials (e.g., dismantled tanks, empty drums, gases).

REACTIVE - Indicate if the waste is reactive (D003) and if it is water reactive, cyanide reactive, or sulfide reactive (40CFR261.23).

TOXICITY CHARACTERISTIC - Check appropriate box and list contaminant level.

3. CHEMICAL COMPOSITION

Indicate if any of the listed chemical components (e.g., copper, nickel, phenols, PCBs, etc.) are present in the waste and indicate the concentration level in ppm or mg/L.

OTHER - Indications of other hazardous characteristics must be included (e.g., explosives, radioactive, etiological, peroxide, etc.).

NOTE: *Explosives, shock sensitive, pyrophoric, radioactive, and etiological waste normally are not accepted by the DRMO for disposal.*

4. MATERIAL COMPOSITION

Section 4 is necessary to determine if any listed wastes have been added to a characteristic waste in addition to the basic material makeup.

List all organic and/or inorganic components of the waste using specific chemical names. If trade names are used, attach Material Safety Data Sheets or other documents which adequately describe the composition of the waste. For each component, estimate the range (in percents) in which the component is present. In case of extreme pH (2 or less or 12.5 or greater) indicate specific acid or caustic species present. This list must include any hazardous components listed in PART II which exceed 10,000 ppm (1%). the total of the maximum values of the components must be greater than or equal to 100% including water, earth, etc.

5. SHIPPING INFORMATION

The presented information is not meant to constitute a standard USDOT certificate given by a shipper offering a package to a transporter.

If the information contained in this section is also given on a manifest at time of turn-in, copy of the manifest will suffice.

Indicate if this waste is regulated by U.S. Department of Transportation (DOT) (49CFR172.01).

PROPER SHIPPING NAME - Enter the proper USDOT shipping name for this waste (49CFR172.101).

HAZARD CLASS - Enter the proper USDOT hazard class (49CFR172.101).

ID# - Enter the proper USDOT Identification Number (49CFR172.101):

ADDITIONAL DESCRIPTION - Enter any additional shipping information required (e.g., "RQ", the names of Hazardous Substance Constituents as they would appear on the Uniform Hazardous Waste Manifest and the packaging) (40CFR172.203).

CERCLA/DOT REPORTABLE QUANTITY (RQ) - Enter the Reportable Quantity for this waste from 49CFR172.101 or 40CFR302.

INSTRUCTIONS (Cont.)

EMERGENCY RESPONSE GUIDE PAGE - Indicate the appropriate guide page found in DOT Publication 5800.4 as required by 40CFR172.602.

SPECIAL HANDLING INFORMATION - Describe those hazards which you know or reasonably believe are or may be associated with short term or prolonged human exposure to this waste (29CFR1910.1200). If known, please identify any carcinogens present in this waste in excess of 0.1% [29CFR1910.1200(d)(4)]. Attach relevant documents as a part of your response if appropriate. If documents are attached, identify those attachments. If you have a current Material Safety Data Sheet, it may be attached. Failure to make an entry in PART 5 is considered to be a representation that you neither know nor believe that there are any adverse human health effects associated with exposure to this waste. Also include in any additional information that will aid in the management of the waste.

6. GENERATOR CERTIFICATION

"CHEMICAL ANALYSIS" OR "USER KNOWLEDGE" OR A COMBINATION OF BOTH IS MANDATORY AND SHOULD BE ATTACHED TO THE HAZARDOUS WASTE PROFILE SHEET. THIS IS USED AS SUPPORTING DOCUMENTATION TO THE WASTE PROFILE SHEET.

An authorized employee of the generator must sign and date this certification on the completed generator's Hazardous Waste Material Profile Sheet.

CHEMICAL ANALYSIS - Attach copy of analysis.

USER KNOWLEDGE - User knowledge is appropriate when it can be documented (e.g., in & out logs, published info, msds, process production info). There is room provided to explain "what" and "why" user knowledge is used in lieu of analysis. Attach all supporting documentation.

PART III

DRMO VERIFICATION

This section will be filled in by the appropriate DRMO personnel.

1. **DATE VERIFIED** - Enter date of last verification testing done on waste stream.
2. **RESULTS** - Enter results of verification testing or attach test results. If attached, please indicate so.

10. HAZARDOUS WASTE MANAGEMENT PROCEDURES

10.1 HAZARDOUS WASTE ACCUMULATION FACILITIES

As a large quantity generator, BAFB may accumulate hazardous waste on-site without a permit for up to 90 days prior to transport off base provided that containers are properly labeled and managed (see Section 10.3). DC HW regulations regarding the accumulation of HW during this time period are more stringent than federal regulations.

Federal regulations allow for the accumulation of HW at a Satellite Accumulation Point (SAP). A SAP may be an area located at or near the place where waste is initially generated and accumulated. A generator may accumulate up to 55 gal of HW or 1 qt of acute hazardous waste at a SAP provided that it is under the direct control of a supervisor. Once these volumes are exceeded, the 90 days accumulation time period becomes effective and the HW must be transferred to a CAF within 3 days.

DC has not adopted the SAP provisions. Under DC regulations, a LQG such as BAFB may accumulate unlimited volumes of HW at or near the place where HW is initially generated and accumulated. These areas are typically referred to initial accumulation points (IAPs) as opposed to SAPs. Additionally, the 90 day accumulation time period becomes effective when the first drop of HW is placed into the container, and applies to the entire content of the container(s). It is up to the discretion of the base to determine when HW containers will be transferred from IAPs to the CAF (Building 18) for disposal in a timely manner; this is not specified in the regulations. However, BAFB must keep in mind that DRMO should be called within 45 days of the initial accumulation of HW to allow enough time for DRMO to pre-inspect and remove the HW off base before the 90 day time limit.

HW at BAFB must be managed in accordance with 40 CFR 263.34(a) (1-4) with respect to the use and management of containers, inspections, record keeping, training, preparedness and prevention, contingency plan and emergency procedures regardless of where it is being accumulated. BAFB HW is temporarily stored at several IAPs and one CAF. BAFB is in the process of officially designating a HW manager and alternate manager for each IAP (See Table 8-2 for IAP locations), as well as providing the manager and alternate manager with proper HW management training. Typically, shop supervisors and their assistants are selected for IAP management positions. BAFB should complete and document this process as expeditiously as possible. The base has already appointed and trained a CAF manager and alternate manager. Table 10-1 identifies the CAF manager and alternate manager.

10.1.1 Central Accumulation Facility (CAF)

The CAF at BAFB is located at Building 18 and is operated by CEV. Figure 10-1 depicts the CAF. Building 18 is not a permitted treatment, storage, and disposal facility (TSDF) since the base does not exceed its 90 day HW accumulation time restriction.

BAFB will comply with the following physical requirements for the CAF:

- a. EPA and State requirements for the location and design will be met.
- b. Containers holding ignitable or reactive wastes must be located at least 15 meters (50 feet) inside the BAFB property boundary.
- c. CAF construction must include an impermeable base or containment system which is capable of preventing environmental contamination due to container overfilling or leaks. Concrete containments shall be treated with a sealant to prevent spills from absorbing into or passing through the concrete. Containers shall not be placed on dirt, sand, gravel, or grass surfaces.
- d. Containers shall not be located near any floor drains that lead to sanitary or storm water sewers.
- e. The base of the containment system shall be sloped to a sump so liquids resulting from leaks, spills, or precipitation are drained and removed.
- f. Different types of HW must be accumulated in separate containers. Non-hazardous waste must not be mixed with HW. For example, waste oil, waste paints, and waste abrasive blasting media, etc. should each be accumulated in separate containers.
- g. Incompatible wastes must be segregated by using either separate containment areas or by means of separately diked areas, or sloped containment to separate sumps. Hazardous chemical reactions which cause heat, fire, explosion, pressure, or the evolution of toxic or flammable decomposition products due to incompatible chemical reactions must be prevented. HW must not be placed in an unwashed container that previously held an incompatible waste or material.
- h. HW must not be located near incompatible materials. For example, lead-acid batteries should not be located near any aluminum structures or surfaces because contact between acid and aluminum may produce flammable hydrogen gas and could lead to a fire or explosion. Containers holding HW which are incompatible with any other wastes or materials should be physically separated from the other materials by means of a dike, berm, or wall.

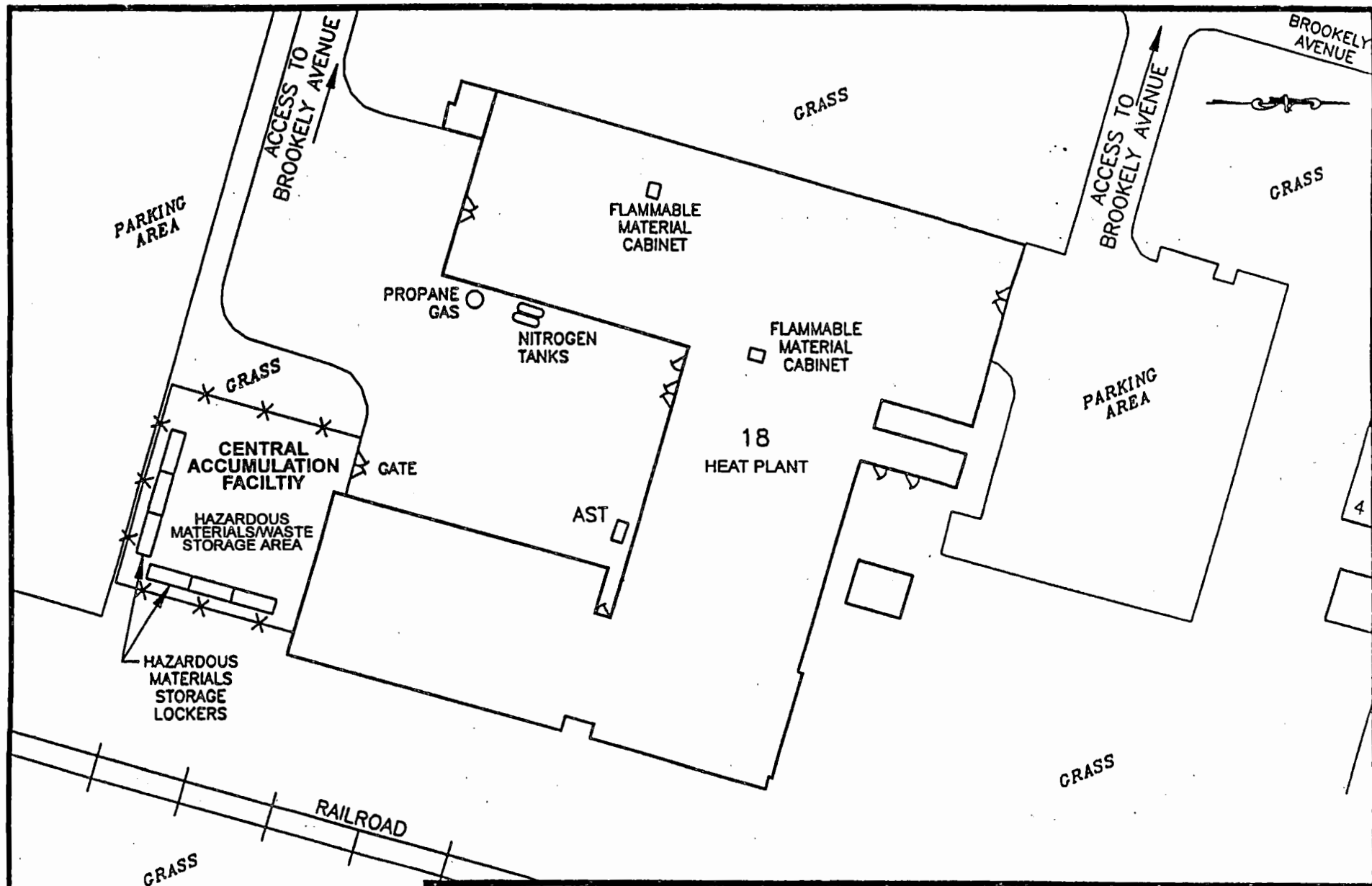


FIGURE 10-1
CENTRAL ACCUMULATION FACILITY
HEAT PLANT, BUILDING 18

- i. Containment systems should be designed and operated to prevent run-on into the container area or with enough excess capacity (beyond that needed for the waste) so any run-on will be contained. Spilled or leaked waste and accumulated precipitation must be removed from the containment area as soon as it is identified to prevent container corrosion or mixing with other wastes. Accumulated precipitation must be checked prior to discharge to ensure that it does not contain HW or HW constituents.
- j. Security must be provided by a fence or similar access control device at the CAF to prevent unauthorized access to the area. Post signs that read "Danger - Unauthorized Personnel Keep Out" in English and any other language predominant in the area that can be seen from any access and large enough to be read at 25 feet.
- k. "No Smoking" signs must be placed conspicuously wherever there is a hazard from ignitable or reactive waste.
- l. Containers in the CAF outdoor areas shall be protected from direct sunlight and precipitation by means of a roof, tarpaulin, or similar device.
- m. Indoor CAF container areas shall be well ventilated. Highly volatile organics in particular can present a serious health hazard when in storage. Also, in the event of a spill or leak, effective ventilation should be installed to safely direct toxic or flammable vapors and fumes out of the work area. Care must be taken to prevent exhausted air from reentering work areas through doors, windows, and air intakes on buildings.
- n. Drums must be placed on pallets to allow for ease of removal when full and to keep them away from accumulated precipitation or spills.
- o. CAF must be inspected at least quarterly by the CAF manager.
- p. Inspections should be performed weekly for containers and daily for tanks. (BAFB does not routinely accumulate or store hazardous waste in tanks; if tanks are ever used for this purpose, the tanks must be inspected daily). The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. During the inspection, container storage areas must be examined to ensure that containers and the accumulation area are in good condition and are in compliance with all applicable regulatory requirements, which include the following:
 - 1. The preparedness and prevention requirements of 40 CFR 265, subpart C.
 - 2. The container requirements of 40 CFR 265, subpart I.
 - 3. The tank requirements of 40 CFR 265, subpart J.
 - 4. The generator pre-transportation requirements of 40 CFR 262, subpart C and 20A DCMR 4202.

Each inspection must be documented and will include the name of the inspector, the location of the accumulation site, date, time of the inspection, any problems that the inspector has found, and a description of actions taken to correct problems if they are detected. Inspection records must be maintained for at least three years from the date of each inspection by CEV.

Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.

10.1.2 Initial Accumulation Points (IAPs)

BAFB will comply with the following physical requirements for its IAPs:

- a. Containers shall not be located near any floor drains that lead to sanitary or storm water sewers.
- b. Different types of HW must be accumulated in separate containers. Non-hazardous waste must not be mixed with HW. For example, waste oil, waste paints, and waste abrasive blasting media, etc. should each be accumulated in separate containers.
- c. Incompatible wastes require segregated containment by using either separate containment areas or by means of separately diked areas, or sloped containment to separate sumps. Hazardous chemical reactions which cause heat, fire, explosion, pressure, or the evolution of toxic or flammable decomposition products due to incompatible chemical reactions must be prevented. HW must not be placed in an unwashed container that previously held an incompatible waste or material. If unsure whether a waste to be disposed of is compatible with waste previously held in the container, contact the BEE or CEV prior to placing waste in the container. In addition, HW must not be placed in an unwashed container that previously held an incompatible waste or material.
- d. HW must not be located near anything with which they are incompatible. For example, lead-acid batteries should not be located near any aluminum structures or surfaces because contact between acid and aluminum may produce flammable hydrogen gas and could lead to a fire or explosion.
- e. "No Smoking" signs must be placed conspicuously wherever there is a hazard from ignitable or reactive waste.
- f. Containers at outdoor IAPs shall be protected from direct sunlight and precipitation by means of a roof, tarpaulin, or similar device.

- g. Indoor IAPs container areas shall be well ventilated. Highly volatile organics in particular can present a serious health hazard when in storage. Also, in the event of a spill or leak, effective ventilation should be installed to safely direct toxic or flammable vapors and fumes out of the work area. Care must be taken to prevent exhausted air from reentering work areas through doors, windows, and air intakes on buildings.
- h. Drums must be placed on pallets to allow for ease of removal when full and to keep them away from accumulated precipitation or spills.
- i. IAP must be inspected by the IAP manager. Inspections should be performed weekly for containers. BAFB does not routinely accumulate or store hazardous waste in tanks; if tanks are ever used for this purpose, the tanks must be inspected daily.
- j. IAP must be inspected at least quarterly by CEV. During the inspection, container storage areas must be examined to ensure that containers and the accumulation area are in good condition and are in compliance with all applicable regulatory requirements, which include the following:
 - 1. The preparedness and prevention requirements of 40 CFR 265, subpart C.
 - 2. The container requirements of 40 CFR 265, subpart I.
 - 3. The tank requirements of 40 CFR 265, subpart J.
 - 4. The generator pre-transportation requirements of 40 CFR 262, subpart C and 20A DCMR 4202.

Each inspection must be documented and will include the name of the inspector, the location of the accumulation site, date, time of the inspection, any problems that the inspector has found, and a description of actions taken to correct problems if they are detected. Inspection records must be maintained for at least three years from the date of each inspection by CEV.

10.1.3 180-DAY AEROSOL ACCUMULATION POINT

BAFB will comply with the following physical requirements for its 180-day Aerosol Accumulation Point:

- a. 180-Day Point will be the only one located on BAFB.
- b. EPA and State requirements for the location and design will be met.
- c. The Puncturing System will be kept in a hard top containment system.
- d. Containers shall not be located near any sanitary or storm water sewers.
- e. Different types of HW must be accumulated in separate containers. Non-hazardous waste must not be mixed with HW.

- f. The Puncturing System will be kept in a hard-top containment system.
- g. Security will be provided by the Recycle Center fenced yard.
- h. "No Smoking" signs must be placed conspicuously wherever there is a hazard from ignitable or reactive waste.
- i. 180-day point will be the only one located on BAFB.
- j. 180-day point will be inspected weekly for containers. Each inspection must be documented and will include the name of the inspector, the location of the site, date, time of the inspection, and any problems if they are detected. Inspection records must be maintained for at least three years from the date of each inspection by CEV.
- k. Operator of the system will wear safety goggles. There will be an Anti-Static Wire to properly ground the drum.
- l. The instruction for the system will be available to operators at all times and will be adhered to.
- m. Maintenance on the system will be performed by the Environmental Hazardous Waste person.

10.2 HAZARDOUS WASTE (HW) ACCUMULATION SITE LOG

Under USAF policy, a log must be maintained at the IAPs and CAF to track all HW containers, and to ensure that the 90 day accumulation time period is not exceeded. Figure 10-2 presents a sample of a typical HW site log. The following information must be documented in the log for each HW container:

1. Container # - Represents a unique waste stream number (see Table 8-3) assigned to the HW (e.g. AB-001) and a consecutive container number (e.g. -001, -002, etc). The container # is marked on the container and on the container's HW profile sheet.
2. Waste Stream - A brief description of the HW in the container.
3. Start Date - the date of initial accumulation. This date should already be written on the container (see Section 10.3.2)

HW Accumulation Site Log							
Entry #	Container #	Waste Stream	Start Date	Container Size	Container Weight	Date Turned In /Transferred	Shipped To
1	AB-001-037	Sand Blast Waste	5 July 94	5 gal drum	50 lb	10 Aug 94	DEMO
2	AB-001-038	↓	↓	↓	↓	↓	↓
3	AB-001-039	↓	↓	↓	↓	↓	↓
4	FL-001-040	Contaminated SP4	8 Aug 94	55 gal drum	150 lb	15 Oct 94	ABC Recycling
5	FL-001-041	↓	↓	↓	↓	↓	↓
6	FL-001-042	↓	↓	↓	↓	↓	↓
7	FL-001-043	↓	↓	↓	↓	↓	↓
8	AB-001-044	Sand Blast Waste	11 Aug 94	5 gal drum	50 lb	15 Sept 94	DEMO
9	AB-001-045	↓	↓	↓	↓	↓	↓
10	AB-001-046	↓	↓	↓	↓	↓	↓
11							
12							
13							
14							
15							

Figure 10-2. Hazardous waste accumulation site log, sample page.

4. **Container Size** - The size of the HW container (e.g., 5-gal L.P., 20-gal drum, etc.) L.P. refers to Lab Pack.
5. **Container Weight** - The weight of the HW container.
6. **Date Turned In/Transferred** - The IAP log should contain the date that the HW is turned-in to the CAF. The CAF log should contain the date the HW is transferred from the CAF to the disposal facility.
7. **Shipped To** - The location to which container was shipped.

10.3 HAZARDOUS WASTE CONTAINERS

10.3.1 Container Selection

Proper HW container selection is based on the DoT Hazardous Material Table listed in 49 CFR §172.101. Table 10-2 provides a sample Hazardous Material Table. 49 CFR §172.101 lists hazardous materials in alphabetical order. Selecting the proper container involves searching the Hazardous Material Table for the hazardous material that generated the HW and identifying the packaging requirements. Column 7 of the Hazardous Material Table refers to special provisions for packaging and transportation. Column 8 identifies the specific packaging requirements for bulk and non-bulk packaging found under 49 CFR Part 173. Table 10-3 provides a reference for identification codes for non-bulk packaging.

10.3.2 Container Labeling and Marking

Before HW accumulation is initiated, the side of each container storing the HW shall be labeled with the following:

1. **"HAZARDOUS WASTE"** written in 1 in. high lettering.
2. **COMMON NAME** of the HW being stored in the container (e.g., waste oil, hydraulic fluid waste).
3. **HAZARD** associated with the HW (e.g., ignitable, toxic, etc.).
4. **EPA NUMBER** for BAFB
5. **WASTE STREAM NUMBER** for BAFB*
6. **ACCUMULATION START DATE**

* Presently BAFB is not using waste stream numbers to identify wastes generated on base. Chapter 8, Waste Stream Inventory, provides a recommended list of waste stream process codes to be incorporated by BAFB in identifying and tracking waste streams in the future. Waste stream process codes should be designated by CEV and issued to IAP and CAF managers.

BAFB must comply with additional container marking requirements prior to shipping HW off site. These requirements are presented in Section 10.6.1.

10.3.3 Container Condition

If a container holding HW is not in good condition (e.g., severe rusting, apparent structural defects, leaking) the HW must be transferred into a container in good condition, or managed in some other way that complies with the requirements of 40 CFR 264 Subpart I.

10.3.4 Container Compatibility

HW shall be stored in a container made of or lined with materials which will not chemically react with and are compatible with the HW stored in the drum.

10.3.5 Container Management

- a. A container holding HW shall always be closed during storage, except when waste is being added.
- b. Containers storage areas must be inspected at least weekly in order to detect leaking or deteriorating containers.
- c. Containers must not be stored or handled in a manner which may cause them to rupture or leak. The following precautions should be taken to prevent container ruptures and leaks:
 - Containers must not be overfilled; fill to 90% of capacity. For example, only fill a 55-gal drum to 50 gal. Liquids expand in containers as the temperature increases. A steel drum painted a dark color can easily rise to temperatures above 100°F and the pressure created by the expansion of the liquid causes bulging heads and damages the integrity of the container. Bulging containers also create a safety hazard for personnel who add waste to or handle the containers.
 - Containers must be protected from freezing during cold weather. Many materials go through a freeze/thaw cycle during changing weather conditions. This freeze/thaw cycle causes metal stress and can result in leaking containers.

TABLE 10-1 SAMPLE HAZARDOUS MATERIALS TABLE AND COLUMN EXPLANATION

HAZARDOUS MATERIALS TABLE (49 CFR § 172.101)													
Sym- bols	Hazardous materials descriptions and proper shipping names	Hazard class or Division	Identifica- tion Numbers	Pack- aging Group	Label(s) required (if not excepted)	Special provisions	(8) Packaging authorizations (\$ 173.***)			(9) Quantity limitations		(10) Vessel stowage requirements	
							Excep- tions	Non-bulk pack- aging	Bulk packaging	Passenger aircraft or railcar	Cargo air-craft only	Vessel stowage	Other stowage provisions
(1)	9 (2)	(3)	(4)	(5)	(6)	(7)	(8A)	(8B)	(8C)	(9A)	(9B)	(10A)	(10B)
D.....	Hazardous waste, solid, n.o.s.	3	NA3077	III	CLASS 9....	B54.....	155	213	241	No limit....	No limit....	A.....	
.....	Naphtha, petroleum.....		UN1255	I	FLAMMABLE LIQUID.....	T8.....							
		8		II	FLAMMABLE LIQUID.....	T8.....							
.....	Sulfuric acid, spent.....		UN1832	II	CORROSIVE...	A3, A7, B2, B83,B84,N34, T9, T27.....							
							150	201	243	1 L.....	39 L.....	E.....	
							150	202	242	5 L.....	60 L.....	B.....	
							None	202	242	Forbidden...	30 L.....	C.....	14
COL #	COLUMNS (1) - (10) INFORMATION												
1	Symbols which identify certain requirements in special situations.												
2	Identifies the proper shipping name.												
3	Identifies the numerical hazard class and/or division.												
4	Identifies the hazard identification number. A number with the prefix "UN" is used for all international shipments. A number with the prefix "NA" can only be used in the United State and Canada.												
5	Identifies the Packing Group assigned. Packing Groups indicate a degree of danger. PG I is greatest; PG II is medium; and PG III is minor.												
6	Identifies the labels which must be applied to packaging.												
7	Identifies special provisions for packaging and transportation. Number Only - all types of packaging and all modes of transportation; A - air transportation; B - bulk packaging [containers with a maximum capacity greater than 450 liters (119 gallons) as a receptacle for a liquid, or greater than 400 kg (882 lbs) for a solid] except inter-modal (IM) portable tanks; H - Applies only to highway transportation; N - non-bulk packaging [containers with a maximum capacity equal to 450 liters (119 gallons) or less as a receptacle for a liquid; equal to 400 kgs (992 lbs or less for a solid]; R - rail transportation; T - inter-modal portable tanks; W - water transportation.												
8	Three columns identifying packaging requirements: (a) exception packaging for limited quantity and consumer commodity (ORM-D); (b) non-bulk packaging; * bulk packaging.												
	Identifies restriction for air transportation						10	Identifies stowage requirements for vessels.					

- Containers of ignitable HW must be grounded. Grounding will prevent build-up of static electricity which may create a spark capable of igniting flammable vapors. When transferring flammable liquids into containers, a bonding wire will be used to connect the two containers as a means of preventing sparks caused by the build-up of static electricity during pouring operations. Contact the BAFB Fire Department for grounding and bonding instructions.

- Drums and other containers must be handled and transported with equipment designed for the task. Drum grapppler attachments may be purchased for two motors to securely grab and move containers. Secure containers to pallets before moving pallets. Utilize drum carts designed for the types of containers being handled to reduce the likelihood of dropping a container during handling. Never balance drums on the forks of a forklift or tow motor.
- Use a funnel to fill closed head containers. This will ensure that all waste is poured into the container and does not spill. If using a funnel without a locking top, the funnel should be removed and the container closed after filling. If the funnel has any HW residues remaining, the residues should be rinsed into the container or the funnel placed in a suitable closed HW accumulation container.
- Drums must not be stacked more than two high. Drums containing flammable liquids should not be stacked.
- Containers should be stored in an area which is well away from or protected from damage due to the movement of vehicles such as trucks, fork lifts, privately owned vehicles (POVs), etc.

- c. Above ground waste containers holding ignitable or reactive wastes must be stored at least 50 feet from the property line.
- d. Adequate aisle space must be maintained in the storage area to allow the unobstructed movement of emergency personnel.
- e. Portable fire extinguishers and spill control equipment (absorbents) should be and regularly tested or inspected.

10.4 HAZARDOUS WASTE TURN-IN

HW generated at BAFB should be transferred from the IAP to the CAF (Building 18) before the 90 day accumulation time period expires to help facilitate its disposal. Hazardous waste generators are responsible for ensuring that the waste they generate is characterized, accumulated, stored, and disposed of in accordance with this HWMP. Generators turning-in HW to the CAF must also ensure that an up-to-date HW Profile Sheet, AF Form 2005 (Issue/Turn-In Request), and DoD Form 1348-1 (Disposal Turn-In Document) is completed.

10.4.1 Procedures for HW Turn-In from IAP

Listed below are the procedures for HW turn-in from an IAP to the CAF. The IAP manager initiates the process and CEV completes the process.

1. The IAP manager completes the HW Profile Sheet for the HW. A HW Profile Sheet is issued for each container of HW being turned into CEV. In the event that more than one container of the same HW is being turned in simultaneously, then a HW Profile Sheet will be issued for the group. Assistance in completing the form can be obtained from CEV or the contractor. Instructions for completing the form are found in Figure 9-4.
2. The IAP manager notifies CEV by giving them the DRMS Form 1930.
3. The IAP manager, assisted by CEV, completes AF Form 2005. Instructions for completing AF 2005 are found in Table 10-4.
4. CEV completes the DoD Form 1348-1. Instructions for completing DoD Form 1348-1 are found in Table 10-5.
5. CEV and the IAP manager arrange for transportation of the material from the IAP to the CAF.
6. CEV receives the container at the CAF (Building 18) and checks the container condition and labeling.
7. CEV enters the container into the CAF Log under an assigned ZZ#.
8. CEV marks the ZZ# on the container and the associated DRMS Form 1930.

10.4.2 Acceptance of Hazardous Waste From Other On-Base Activities

Occasionally, small quantities of HW may be generated from Base activities which are not associated with an IAP or which do not normally generate HW. When this occurs, CEV should be contacted by the generator. CEV will then follow the turn-in procedure as provided in Section 10.4.1.

Only HW generated by BAFB is accepted into the CAF at Building 18. The HW that is generated by Artificial Intelligence at Building 256 is transferred to NRL's CAF (Building 82) for disposal. HW from facilities outside of BAFB will NOT be brought onto the base.

TABLE 10-3 INSTRUCTIONS FOR COMPLETING AF FORM 2005

Block/Position Number	Description of Item to Enter
1-3	"TIN" to designate a turn-in action.
8-11	Federal Stock Class number which produced the waste. (See Table 10-6 for sample Federal Stock Class designation)
12-14	"PHW" in this location
15-18	EPA HW code or base designated code
19-22	Contract line item number (CLIN) (Contact Base Supply for the appropriate CLIN)
23-24	Unit of waste in pounds
25-29	Quantity of the waste in pounds
30	Activity code
31-35	Organization and shop code
36-39	Julian date (Provided by Base Supply)
40-43	Local serial number (Provided by Base Supply)
44	"H" for hazardous waste
62	"9" for the Action Taken Code
I	The cost per lb/total price per pound for disposal
J	Name of the waste.

TABLE 10-4 INSTRUCTIONS FOR COMPLETING DoD FORM 1348-1

Block/Position Number	Description of Item to Enter
C	"HW" for hazardous waste
8-11	Federal Stock Class number which produced the waste (See Table 10-6 for sample Federal Stock Class designation)
15-18	EPA HW code or base designated code
30-43	The 14-position document number which includes the 6-position DODACC for Base Supply, the 4-position date, and the 4-position serial number in Columns 30-43
51	"A"
52-53	Appropriate fund code
74-80	Unit acquisition cost
FF	The Contract Line Item Number (CLIN) (Contact Base Supply for the appropriate CLIN)
GG	Total cost of disposal (CLIN x unit cost)
12	The 6-position bill to DODAAC if other than Base Supply DODAAC (FB2857)
W	Signature of CEV representative

TABLE 10-5. COMMON FEDERAL STOCK CLASSES

9150	Petroleum, oils, lubricants
8010	Paints, waste paint related material
6350	Antifreeze, windshield washer fluid
6850	Solvents
5950	Transformers
9999	Spill residue

10.5 ON-BASE TRANSPORTATION

HW that is transported on-base must be done so in a manner that will not endanger the health of installation personnel or the environment.

The IAP manager should ensure that containers are in good condition. Prior to turning-in HW, each container should be inspected by the IAP manager to ensure that HW is transported in the proper DOT-specification containers. The container should have no leaks and no accumulation of liquid on the top head. Also, there should be no serious corrosion, dents, sharp creases, or bulging heads. If the container has a leak or if it is not in good condition, the waste in the drum must be transferred to a container in good condition or the container must be over packed in a salvage drum.

If the IAP manager or waste generator does not have the capabilities to transport HW, CEV should be contacted to arrange for waste pick-up and transportation. Prior to a vehicle leaving with the waste it should be closely inspected to ensure that containers are securely loaded and that incompatible wastes are not loaded next to each other. Vehicles transporting bulk waste should be examined to ensure that all pumps, valves, and fittings are closed tight and secure.

10.6 OFF-BASE TRANSPORTATION

10.6.1 Container Labeling

- a. Federal and DC regulations require that all containers of HW used for transport display a label similar to the one depicted in Figure 10-3. The color and format of the label may vary slightly by supplier.
- b. The proper DOT shipping labels are also required to be placed on containers prior to transport off base. DOT labels can be recognized by their familiar "square on point" format as depicted in Figure 10-4.
- c. Other labels such as "Corrosive", "Poison", "Flammable Gas", etc. are also required by law.
- d. Non-bulk packaging (container of 110 gallons or less) used to transport HW must also display the information depicted as Figure 10-5.

10.6.2 Hazardous Waste Manifest

A HW manifest must be completed by the IAP manager or CEV for any HW that is transported off-base. The Installation Commander (IC) or designee (CEV) are responsible for completing and signing the generator section of the HW manifest. D.C. does not have its own manifest; however, it will accept the use of the federal manifest or any state manifest that duplicates the federal uniform hazardous waste format. The HW manifest is presented as Figure 10-6. Instructions for completing the HW manifest are presented as Figure 10-7.

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. _____ EPA WASTE NO. _____

ACCUMULATION START DATE _____ MANIFEST DOCUMENT NO. _____

[_____]
[_____]
[_____]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Printed By: Lab Safety Supply Inc., Janesville WI 53547-1368

Reorder No. 433

FIGURE 10-3. HAZARDOUS WASTE SAMPLE LABEL.



FIGURE 10-4. DOT SHIPPING LABEL.

Required Marking for Non-Bulk Packing
"HAZARDOUS WASTE--Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
 Generator's Name and Address Manifest Document Number"

Figure 10-5 Required EPA Marking For Non-Bulk Packaging (Containers of 110 Gallons or Less)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address						A. State Manifest Document Number									
						B. State Generator's ID									
4. Generator's Phone ()															
5. Transporter 1 Company Name			6. US EPA ID Number			C. State Transporter's ID									
						D. Transporter's Phone									
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID									
						F. Transporter's Phone									
9. Designated Facility Name and Site Address			10. US EPA ID Number			G. State Facility's ID									
						H. Facility's Phone									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.			
						No.		Type		Quantity		Wt/Vol			
						a.									
						b.									
						c.									
d.															
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
15. Special Handling Instructions and Additional Information															
<p>16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.</p> <p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>															
Printed/Typed Name					Signature					Month		Day		Year	
17. Transporter 1 Acknowledgement of Receipt of Materials															
Printed/Typed Name					Signature					Month		Day		Year	
18. Transporter 2 Acknowledgement of Receipt of Materials															
Printed/Typed Name					Signature					Month		Day		Year	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.															
Printed/Typed Name					Signature					Month		Day		Year	

ORIGINAL — RETURN TO GENERATOR

Figure 10-6

Figure 10-7 Hazardous Waste Manifest Instructions

Hazardous Waste Manifest Instructions			
Item	Title		Instructions
1	Generator's U.S. EPA ID number and Manifest Document Number		Enter the installation's unique 12-digit EPA identification number. Immediately following the EPA ID number, enter a unique five-digit number which assigned to this manifest (number each shipment consecutively or use the Julian date which corresponds to the shipment date).
2	Page 1 of _____		Enter the total number of pages used. Continuation sheets must be used if more than four waste types are being shipped to the same TSDF on the same shipment or if more than two transporters are used.
3	Generator's Name and Mailing Address		Enter the name and mailing address of the installation's organization that will manage the returned manifest forms (normally the environmental manager).
4	Generator's Phone Number		Enter the phone number of an authorized organization on-base that can be reached in the event of an emergency, twenty-four hours a day while the shipment is in transit. <i>See Emergency Communication Requirements.</i> ^(a)
5	Transporter 1 (Company Name)		Enter the company name of the first transporter who will transport the waste off-installation.
6	U.S. EPA ID Number for Transporter 1		Enter the U.S. EPA twelve digit identification number of the first transporter identified in Item 5.
7	Transporter 2 (Company Name)		If a second transporter will be used to transport the waste to the designated TSDF enter the name of the second transporter. If more than two transporters are used, the additional transporters must be listed on the continuation sheet. <i>Every transporter used between the installation and the designated facility must be listed.</i>
8	U.S. EPA ID Number for Transporter 2		If a second transporter will be used, enter the second transporter's U.S. EPA identification number.
9	Designated Facility Name and Site Address		Enter the company name and the site address of the facility you have designated to receive the hazardous waste listed on the manifest. <i>The address must be the site address and cannot be a post office box or rural route number.</i>
10	U.S. EPA Identification Number for Designated Facility		Enter the U.S. EPA twelve-digit number of the designated facility identified in item 9.
11	U.S. DoT Proper Shipping Name, Hazard Class, and ID Number, and Packing Group (HM-181 change)		Enter the best and most descriptive DoT proper shipping name, hazard class, UN or NA identification number, and packing group. This information should be listed on the hazardous waste profile sheet for the waste stream. Review the Hazardous Materials Table and the appendix to the Hazardous Materials Table in 49 CFR 172 to ensure the proper shipping name is correct. Use the continuation sheet if space for additional waste descriptions is needed. <i>*See Emergency Communication Requirements.</i> ^(a)
12	Number and Type of Containers		Enter the number and type of containers for each waste.
	Abbreviation	Type of Container	Abbreviation Type of Container
	DM	Metal drums, barrels, kegs	DT Dump trucks
	DW	Wooden drums, barrels, kegs	CY Cylinders
	DF	Fiberboard or plastic drums, barrels, keg	CM Metal boxes, cartons, cases (including roll-offs)
	TP	Portable tanks	CW Wooden boxes, cartons, cases
	TT	Cargo tanks (tank trucks)	CF Fiber or plastic boxes, cartons, case

Hazardous Waste Manifest Instructions

TC	Tank cars	BA	Burlap, cloth, paper, or plastic bags
13	Total Quantity	Enter the total quantity, excluding the weight of the packaging, of waste described on each line.	
14	Unit of Measure	Enter the appropriate unit of measure (either by weight or by volume) for each waste listed in item 13. G - Gallons (liquids only); P = Pounds; T = Tons (2000 pounds); Y = Cubic Yards; L = Liters (liquids only); K = Kilograms; M = Metric tons (1000 kilograms); and N - Cubic Meters.	
15	Special Handling Instructions	If the installation is exporting the hazardous waste, the city and state where wastes will depart from the United States must be entered in this block. This block may be used to indicate special transportation, treatment, storage, or disposal information of bill of lading information. For example, the waste characterization or profile number assigned to your waste by the designated TSDF can be entered in this space. The space may also be used to designate an alternate TSDF to which the waste should be transported if the primary designated facility is unable to receive the waste. *See <i>Emergency Communication Requirements</i> ⁽¹⁾ .	
16	Generator's Certification	<p>The generator must read, sign by hand, and date the certification statement. When the manifest is signed, the person signing it is legally certifying the following: the shipment is fully and accurately described on the manifest; the containers are in proper condition for transportation; a waste minimization program is in place at the installation; and the method of treatment, storage, or disposal is the best available to the installation.</p> <p>The Base Commander or his designees has primary responsibility for signing the manifest as the generator. The designees should be the servicing DRMO or the installation environmental manager. Where DRMO is not the Base Commander's designee, DRMO will co-sign all manifests for shipments of hazardous waste on Defense Logistics Agency accountable records.</p> <p>If a mode of transportation other than highway is being used, cross out the word "highway" in the certification and insert the appropriate mode of transportation, such as rail, water, or air. If rail, water, or air transportation of your waste will occur in addition to highway transportation, add the words "and rail," or "and water," or "and air" after the "highway" in the certification.</p> <p>If the installation is exporting the hazardous waste, add at the end of the first sentence of the certification the following words: "and conforms to the terms of the EPA Acknowledgment of Consent to this shipment."</p>	
17	Transporter 1 (Acknowledgment of Receipt of Materials)	The first transporter must print or type the name of the person accepting the waste, sign, and date the manifest to acknowledge receipt of a shipment. <i>Obtain the hand written signature of the first transporter before the waste is shipped off-installation and retain this copy of the open manifest.</i> Transporters must then deliver the waste to the next designated transporter (If indicated in item 7), the designated facility (as indicated in item 9), an alternate facility designated by the installation, or a designated place outside the United States if the installation is exporting the hazardous waste.	
18	Transporter 2 (Acknowledgment of Receipt of Materials)	If more than one transporter is used, the second transporter, must print or type the name of the person accepting the waste, sign, and date the manifest to acknowledge receipt of a shipment from the first transporter.	

Hazardous Waste Manifest Instructions

Note 1: Items A through K (shaded area) are not required by the Federal regulations. However, many states may require the waste generator or the TSDF to complete some or all of this information. The instructions listed above are typical of the state requirements but state environmental authorities should be contacted to specific requirements have been identified.

Note 2: Emergency Communication Requirements. Emergency response telephone numbers must be entered on a manifest either immediately following description in item 11, in item 4, or another clearly visible location if the number is for all wastes listed on the manifest and the manifest indicates that the number is for emergency response information. For example, the notation "EMERGENCY CONTACT: (555) 555-1234" is an appropriate way to identify the emergency response telephone number on a manifest.

DoT regulations also require additional emergency response information to be included on the manifest or attached to the manifest. The manifest must include, as a minimum, the following information: hazardous materials description; immediate hazards to health; risks of fire or explosion; immediate precautions to be taken in the event of an accident or incident; immediate methods for handling small or large fires; initial methods for handling spills or leaks in the absence of fire; preliminary first aid measures; and 24-hour manned emergency response telephone number. Transporters must keep the information easily accessible during transportation. A reference for each waste stream to the appropriate guide page in the DoT Emergency Response Guidebook in Section 15 of the manifest will satisfy this requirement if the transporter maintains a copy of the Guidebook in the vehicle at all times.

The following burden disclosure statement must be included with each uniform hazardous waste manifest, either on the form, in the instructions to the form, or accompanying the form:

"Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage, and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing the burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and the Budget, Washington, DC 20503.

Hazardous Waste Manifest Instructions		
19	Discrepancy Indication Space	<p>The designated TSDF or alternate designated facility must note in this space any significant discrepancies between the quantity or type of waste described on the manifest and the quantity or type of waste actually received at the facility. Significant discrepancies in quantity are, for bulk wastes, variations greater than ten percent by weight. A variation in piece count is considered to be a significant discrepancy for waste delivered in containers. For example, one missing or extra drum in a truckload is a significant discrepancy.</p> <p>Significant discrepancies pertaining to the type of waste would be obvious differences, discovered by the TSDF, between the type of waste described on the manifest and the type of waste actually received. For example, waste solvent substituted for waste acid or toxic constituents not reported on the manifest are significant discrepancies.</p>
20	Facility Owner or Operator Certification of Receipt of Hazardous Materials Covered by this Manifest Except as Noted in Item 19	The owner, operator, or authorized representative of the TSDF must print or type and sign his or her name, and enter the date. By signing the manifest, the TSDF acknowledges that the waste has been received and accepted, except for any discrepancies noted in item 19. The TSDF must retain a copy of the manifest and, within 30 days of delivery, send a copy of the closed manifest to the generator.
A ⁽¹⁾	State Manifest Document Number	this is usually a preprinted number on state manifests. Carry over to continuation sheets.
B ⁽¹⁾	State Generator's ID	Enter if state ID number is different than U.S. EPA ID number.
C ⁽¹⁾	State Transporter's ID	Enter state certified hauler number and driver certification number (if required by state).
D ⁽¹⁾	Transporter's Phone	Enter number where authorized agent can be contacted during an emergency.
E ⁽¹⁾	State Transporter's ID	Enter state certified hauler number and driver certification number (if required by state).
F ⁽¹⁾	Transporter's Phone	Enter number where authorized agent can be contacted during an emergency.
G ⁽¹⁾	State Facility's ID	Enter state ID number.
H ⁽¹⁾	Facility's Phone	Enter number where authorized agent can be contacted during an emergency.
I ⁽¹⁾	Waste Number	Enter EPA hazardous waste number.
J ⁽¹⁾	Additional Description for Materials Listed Above	Enter EPA hazardous code (I/C/R/E/H/T), physical state (solid-S; liquid-L; gas-G; sludge-SL), specific gravity, and estimated percentage of each waste constituent.
K ⁽¹⁾	Handling Codes for Wastes Listed Above	Enter code for how waste will be handled (landfill-L; incineration, heat recovery, burning-B; chemical or physical treatment-T; reuse or recycling-R; and storage-S).

Figure 10-7 (Cont.)

10.6.3 Exception Report

If CEV does not receive a copy of the manifest from the designated TSDF within 35 days of the date the waste was accepted by the initial transporter, an attempt must be made to locate the HW manifest. After 45 days, if CEV is unsuccessful in locating the HW manifest, CEV must complete and submit an exception report to DCRA. The report must include a copy of the HW manifest and a cover letter describing the efforts taken by BAFB to determine the location of the hazardous waste.

10.6.4 Transporter

All HW must be transported off-base by an EPA or DC certified HW transporter. Table 10-7 lists transportation selection criteria.

10.6.5 TSDF Selection

In most cases, DRMO acts as the disposal agent for BAFB. However when BAFB must use other HW disposal contractors, USAF procurement requirements for service contracts must be followed. Table 10-8 lists TSDF selection criteria that should be used when DRMO is not the disposal agent.

10.6.6 Land Disposal Restrictions

Land disposal of hazardous waste is not permitted in DC

10.7 RECORD KEEPING

RCRA requires the maintenance of certain HW records on-base. The type of records, along with the retention time and a CFR reference which describes each record is presented in Table 10-9. CEV should maintain and know the locations of the files identified in Table 10-9. These files should be made available to appropriate federal, state, and AF inspectors upon request.

CEV will maintain copies of DRMS Form 1930, DoD Form 1348-1, Hazardous Waste Manifests, Delivery Orders, and Log Books in an active file for a minimum of 3 years. After the 3 year period, all files are archived indefinitely.

CEV will maintain updated copies of the HWMP which includes the waste stream inventory (Chapter 8), and WAP (Chapter 9).

TABLE 10-6 TRANSPORTATION SELECTION CRITERIA

Criteria for Transporter Selection ⁽¹⁾
<p>• Does the company have an EPA Identification number for hazardous waste transportations?</p> <p>Ask the transporter for their identification number, call the state environmental agency (of EPA Regional office) to validate the number, and confirm that the number has not been revoked, terminated, or suspended. Alternatively, you could directly inquire of your state environmental agency if the company you are considering has a current EPA Identification Number.</p>
<p>• Does the transporter have the proper vehicle and/or equipment to carry the HW?</p> <p>Container shipments typically require a type of flatbed truck (such as a closed trailer); if the installation requires hazardous waste to be removed from a tank, the transporter must be able to provide tank trucks.</p> <p>Evaluate the equipment carried by a transporter to facilitate the loading of the shipment and to respond to spills. A transporter with a flatbed truck carrying pallet jacks, dollies, and open head drums with fresh absorbent and (sparkproof) shovels and whose truck has a hydraulic lift (if no loading dock is available) is better prepared and quite likely more capable of transporting your waste than a transporter with no loading or spill response equipment. A transporter with a tank truck who carries a vacuum pump and flexible hosing for evacuating a storage tank is preferred over one without such equipment.</p>
<p>• Has the transporter been cited for any violation by EPA or DoT?</p> <p>Determine if there have been any significant violations for each potential transporter. The greater the number and severity of violations, the less the credence to have in a transporter. Contact both the EPA and DoT. EPA regulates transporters primarily in areas of manifest documentation and hazardous waste discharges. Contact the environmental agency in the state in which the transporter operates (or the regional EPA if the state does not have RCRA authorization) to identify any manifest-related violations and citations for inadequately responding to, reporting, or cleaning up a hazardous waste discharge.</p> <p>If a transporter only carries hazardous waste within state boundaries (i.e., intrastate transportation), it is regulated by the state Department of Transportation in which the transporter operates. The enforcement branch of the state DoT primarily conducts and documents roadside inspections. Contact the state DoT to determine if a hazardous waste carrier has been found in violation of requirements relating to safety equipment and motor vehicle safety. The state DoT can also indicate if the transporter has been granted operating authority by the state, and if the insurance carrier for the transporter has provided certification of any state-required motor vehicle insurance.</p> <p>A transporter that crosses state lines (i.e., interstate transportation) is subject to inspection by both state and Federal DoT requirements. When the Federal DoT inspects a transporter, an on-site inspection is conducted, during which driver log books, vehicle maintenance files, accident report files, incident (spill) report files, driver qualification files, and the transporter's driver training program are examined. Copies of the inspection reports and subsequent violations can be obtained by writing DoT at the following address: U.S. Department of Transportation, Attn: Freedom of Information Officer, 400 Seventh and D Street, SW, Washington, DC 20590, (202 366-0534).</p>
<p>• Does the transporter have the necessary permits to carry the waste interstate or intrastate?</p> <p>EPA does not require a permit for transporters to carry hazardous waste, however most states have permit requirements⁽²⁾. Additionally, some states require a permit for a vehicle to transport hazardous waste through their state. Determine if the transporter is permitted to operate in the state in which it is based by contacting the state DoT. Determine the route that your transporter will follow to the TSDF. If the route takes the transporter outside of the state in which it is based, call each state DoT to determine if a permit is required for a vehicle to haul hazardous waste through the state. Ask the transporter in which states it is permitted to operate to help determine if a transporter has the authority to carry hazardous waste interstate and if it is aware of state-specific permitting requirements.</p>
<p>• Does the transporter have at least the required minimum amount of insurance?</p> <p>If a transporter is solely involved in intrastate transportation of small quantities of hazardous waste (i.e., less than 3,500 gallons), it is subject to state-specific requirements for insurance. Determine whether or not a transporter has minimum state-required coverage by contacting the Department of Transportation for the state in which the transporter is based. Alternatively, this information may be obtained by requesting the transporter to furnish you with a certificate of insurance. If there are any questions regarding the validity of an insurance certification, the company issuing the certification (and hence the policy) should be contacted.</p> <p>When a transporter is involved in interstate transportation of hazardous waste, it is required to maintain a minimum of \$1 million insurance. A transporter involved in carrying large amounts of hazardous waste (i.e., ≥ 3,500 gallons) must maintain at least \$5 million insurance, regardless of whether the transporter is involved in intrastate or interstate commerce.</p> <p>A transporter can either contract with an insurance carrier or, under certain conditions, it can self-insure. Federal transportation regulations require proof of financial responsibility must be maintained on-site with the transporter. Therefore, you can verify that a transporter has adequate insurance by requesting a copy of the transporter's MCS 90 form (if insured through an insurance company) or their MCS 82 form (if self-insured).</p>

Criteria for Transporter Selection⁽¹⁾

- **Would current or past customers recommend the transporter?**

To gauge the dependability, reliability, and competence of a transporter prior to contracting their service, contact past and present customers for their evaluation. Most transporters will gladly supply a list of customers, although that list may be biased towards favored customers. An alternate method to obtain the names and addresses of a transporter's clients is to obtain the manifest file for the transporter. This may be done if an on-site audit of the transporter is conducted, or by contacting the state environmental agency in the state from which the transporter is based and requesting a copy of the manifest file for the transporter. Note: although there is not Federal requirement under RCRA to file manifests with the appropriate state agency, many states have enacted hazardous waste management regulations that require the filing of manifests with the state.

- **What kind of and how much experience does the transporter have?**

Searching out past and present customers is one factor in the equation used to determine the experience of a hazardous waste transporter. Important to this consideration is the factoring in of other services that a transporter offers and the length of time a transporter has been in business. For example, a transportation firm that also provides emergency remediation services in the event of a release is an indication that the transporter can efficiently and effectively handle its own spills.

- **How much lead time is required before a shipment can be carried off-installation?**

Time plays a crucial role in the management of hazardous waste. Neither the state nor EPA will routinely make allowances for waste that remains on-site past the accumulation time limit (the state may grant a 30-day extension on a case-by-case basis). Determine the lead time, i.e., the amount of time required for a transporter to arrive at the installation after being notified that a shipment is ready. Ensure that the transporter is capable of reliably responding on the date required.

- **How much does the service cost?**

Cost should not be viewed as the most significant factor in selecting a hazardous waste transporter and its significance should be weighed in the light of all other factors discussed above. While hazardous waste transportations is a competitive industry, a relatively low price tag may translate into delaying of vehicle maintenance, reduction of the amount of emergency response equipment carried on-board, and the employment of marginally qualified drivers and technical assistance personnel - all of which decrease the factor of safety with which all transporters must operate. *When evaluating bids for hazardous waste transportation services, bids that are excessively low by comparison should be questioned and evaluated cautiously.*

Note 1. Lists of transporters authorized to transport hazardous waste may be obtained from the host state environmental agency, the regional EPA office, or reference books commercially available that list hazardous waste transporters.

Note 2. In granting an EPA identification number, the agency issuing the number is not attesting to the competency or capability of the transporter, it is only acknowledging that the company is registered to transport hazardous waste.

TABLE 10-7 TSD FACILITY SELECTION CRITERIA

TSD Facility Selection ⁽¹⁾
<p>• Capability to Treat Wastes:</p> <p>Determining the appropriate TSDF begins first by knowing the EPA hazardous waste number for each waste to be shipped and determining which TSDFs are permitted to accept your hazardous waste. This determination can be made by writing or telephoning a TSDF and inquiring if the facility is permitted to receive waste with the hazardous waste numbers the installation generates. Request a list of hazardous waste numbers for which the TSDF is permitted or contact the environmental agency of the state in which the facility is located, to obtain a list of hazardous wastes that the facility is permitted to accept.</p> <p>When a hazardous waste manifest is signed, the Base Commander (or his designee) is certifying that the methods used by the TSDF to treat or dispose of the waste are the best available for minimizing the present and future threat of the hazardous waste to human health and the environment. The environmental flight (in cooperation with DRMO) should determine the best treatment or disposal method for each waste. While some wastes can be rendered non-hazardous by only a single method, there are a variety of treatment alternatives available for the majority of hazardous wastes. Evaluating each method and determining the installation's most practicable method may turn into a technically challenging, as well as labor-intensive task. Even though a hazardous waste is consigned to a TSDF, the waste generator retains legal responsibility for the waste. If the waste is mismanaged by the TSDF, EPA or the state can ultimately bring suit against the generator to remedy the problem (e.g., a generator can be sued to finance a clean-up action).</p> <p>First consider recycling the waste or sending it to a TSDF that can recycle or reclaim the hazardous waste. If recycling or reclamation is not available, consider a facility that offers a method that is practical and available which achieves environmentally beneficial reductions of waste toxicity and/or mobility.</p>
<p>• Permit Status:</p> <p>Confirm that the facility is a permitted or interim status TSDF and verify this with the state or regional EPA.</p>
<p>• History of Violations:</p> <p>Every TSDF must be inspected by EPA or representatives of the state environmental agency at least once every two years; Federal and state owned or operated TSDFs must be inspected at least annually. As a result, there is a written record, which records each facility's status with respect to compliance with RCRA. Base on inspections, TSDFs are cited for violations of the law. The inspection report records are available to the public and should be reviewed prior to selecting a TSDF (as well as periodically while using the facility's services).</p> <p>Inspection reports and notices of violations can be obtained by submitting a written Freedom of Information Act request to the Freedom of Information Officer at the state or regional EPA.</p> <p>When reviewing inspection reports and subsequent notices of violation, keep in mind that because of the enormity of hazardous waste management regulations with which a facility must comply, some paperwork violations that occur on an infrequent basis may be inevitable. And though excessive paperwork violations may signal a problem, more serious violations should be examined and evaluated carefully; serious violations may indicate serious problems with the facility.</p> <p>A variety of other files available to the public can be used to help establish reliability and compliance status of a TSDF. Depending on the agency, there may be a file dedicated to enforcement actions, legal suits brought against a facility, and correspondence to and from agency officials, as well as the facility permit application itself.</p> <p>In addition to the hazardous waste requirements of RCRA, a TSDF may also have to comply with requirements of the Clean Air Act if there are any air emissions from the facility, the Clean Water Act if it discharges wastewater, and the Occupational Safety and Health Act's general industry standards. A comprehensive history of compliance identifying all notices of violation, consent orders and agreements, and levied administrative, civil, and criminal penalties can be developed by contacting each state agency that administers the law (e.g., the state air quality division, state water quality division, and the state OSHA).</p>
<p>• Condition of the Facility:</p> <p>This is best evaluated by conducting an on-site visit. Typically, TSDFs are happy to exhibit their storage facilities and structures, analytical instrumentation, disposal units, and treatment and processing equipment to present and potential customers. Such visits must often be scheduled in advance in order to arrange for a technically competent employee to be available to answer your questions.</p> <p>When conducting a site visit, take note of the general housekeeping practices and appearance in the areas where the waste is off-loaded, stored, processed, treated, and disposed. Poor housekeeping and appearance may be an indication of poor or weak management or at the very least, may represent poor hazardous waste management practices.</p> <p>Look for potential safety hazards, condition of facilities and equipment, and availability and use of safety equipment. Be aware of detectable odors. Your decision to select a TSDF can be strongly influenced by the degree of order and concern for safety at the facility. Review the standards for TSDFs in 40 CFR 264 or 265 before the site visit to focus on the necessary requirements.</p>

TSD Facility Selection⁽¹⁾

• Liability Insurance:

TSDFs are required to maintain liability insurance either through a carrier or through a self-insurance program and are also required to maintain up-to-date financial assurance for closure and post closure care as part of their Part B permit. Your decision to select a TSDF should be based partly on the extent of insurance coverage maintained by the facility, its overall financial status/credit rating, and the extent to which the contractual arrangements and their insurance policies will protect the Air Force from future liability.

• Costs:

Cost of treatment, storage, or disposal services must be evaluated but it should not be the only criterion upon which a TSDF is selected. According to Air Force policy, the installation Contracting Officer ensures that only qualified hazardous waste disposal contractors (not just low price bidders) are awarded contracts. Before the final selection, you should make an attempt to factor in all considerations presented above.

When the manifest is signed, the installation commander (or designee), is certifying that the methods used by the TSDF to treat or dispose of the waste are the best available for minimizing the present and future threat of the hazardous waste to human health and the environment. It is not the goal of EPA to force each installation to exhaustively search throughout the country and pay an unreasonable sum of money for any method of waste treatment, storage, or disposal. EPA allows the installation the flexibility to reasonably, yet defensibly, select the most practicable method.

1. A list of permitted and interim status TSDFs may be obtained from the state (or regional) environmental agency. The reference materials discussed in the note of table 5.8 can be reviewed to determine which facilities offer TSD services. In addition, during the first quarter of each year, McCoy and Associates publishes a directory of commercial hazardous waste management facilities as part of one of the bimonthly issues of *The Hazardous Waste Consultant*. This can be obtained from McCoy and Associates at 13701 West Jewell Avenue, Suite 252, Lakewood, Colorado 80228.

TABLE 10-8 RCRA RECORDS AND CORRESPONDING MINIMUM
RETENTION PERIODS

Record or File	Retention Time	Citation
Hazardous Waste Determination	3 years from the date that the waste was last sent to a treatment storage, or disposal facility*	40 CFR 262.11 20A DCMR 40-54
Annual Report	3 years from the due date of the report*	40 CFR 262.41 20A DCMR 40-54
Hazardous Waste Manifest	3 years from the day the waste was accepted by the initial transporter*	40 CFR 262.20 20A DCMR 40-54
Accumulation Site Inspection Logs	3 years from the date the inspection was conducted*	40 CFR 262.34 40 CFR 265.174 20A DCMR 40-54
Exception Reports	3 years from the due date of the report	40 CFR 262.42 20A DCMR 40-54
Land Restricted Waste Determination	5 years from date the determination was required to be conducted. If not required, 5 years from the date the waste was last sent to a TSD facility*	40 CFR 268.7 20A DCMR 40-54
Land Restriction Notice & Certification	5 years from the date the waste was last sent to a TSD facility*	40 CFR 268.7 20A DCMR 40-54
Notification of Intent to Export Waste	3 years from the date the hazardous waste was accepted by the initial transporter*	40 CFR 262.54 20A DCMR 40-54
Employee Training Records	Current personnel: until closure of facility	40 CFR 262.34 20A DCMR 40-54
	Former personnel: 3 years from date the individual last worked at facility	40 CFR 265.16 20A DCMR 40-54

* It is recommended that BAFB retains records beyond the time period required by RCRA. If any facilities that receive wastes generated by BAFB were to be listed on the National Priorities List as a Superfund site, disposal records would be important to show what wastes were and were not disposed of by the facility.

11. REPORTING

11.1 BIENNIAL REPORT

DC requires facilities that dispose of hazardous waste off-site to submit a Biennial Report to DCRA by 1 March of each year. The report must be completed using a DCRA approved form and must cover the generator's activities during the previous two calendar years. Annual reports contain the following information:

- The EPA identification number and address of BAFB.
- The calendar year for which the report is written.
- The EPA identification number, name, and address of each off-site treatment, storage, and/or disposal facility in the United States to which the HW was transported during the reporting year.
- The EPA identification number and name of each transporter used during the reporting year.
- The EPA hazardous waste number, description, DOT hazard class, and quantity of each HW transported to a off-site treatment, storage, and/or disposal facility during the reporting year. This information should be listed by the TSD identification number.
- A description of the efforts undertaken during the reporting period to reduce the volume and toxicity of waste generated.
- A description of the changes in volume and toxicity of waste actually achieved during the reporting period in comparison to previous years.
- A certification of the above information signed by the IC or an authorized representative.

11.2 EXCEPTION REPORT

See Section 10.6.3.

11.3 EMERGENCY REPORT

Releases of HW, hazardous substances, and hazardous materials into the environment in the District of Columbia must be immediately reported to:

DCRA	(202) 673-2102 ext 3161
Local Emergency Planning Commission (LEPC)	(202) 673-3320
National Response Center	(800) 424-8802

Refer to the Emergency Reporting and Information List presented in Chapter 1 of this plan.

For additional requirements regarding the reporting of spills, fires, or explosions, refer to the BAFB Spill Prevention and Response Plan (SPRP).

11.4 INCIDENT REPORT

In the event that the BAFB SPRP is implemented, an incident report must be submitted within 15 days after the incident to DRCA's Hazardous Waste Branch.

Reporting for any HW incident is mandatory and shall be performed by contacting all the organizations listed on the Emergency Reporting and Information List presented in Chapter 1 of the Plan.

11.5 QUARTERLY REPORT TO THE COMMANDER

BAFB reports on a quarterly basis to the 11th Wing Vice Commander. The report contains information regarding the base's progress in meeting HW minimization goals and HW generation.

11.6 OTHER REPORTS

If requested by the EPA or other regulatory requirements, BAFB will submit reports pursuant to 40 CFR 264 (or 265 as appropriate) subparts F and K through N.

12. TRAINING

12.1 HAZARDOUS WASTE TRAINING REQUIREMENTS

Personnel handling hazardous waste may be exposed to a variety of health and safety hazards. Proper hazardous waste management training can minimize human exposure to these hazards and reduce the potential for injury. Proper training can also minimize the potential for adverse environmental impacts associated with mishandling of hazardous waste.

12.1.1 Mandatory Training Requirements for Personnel

Hazardous waste management training is required for the following BAFB personnel who operate or handle hazardous waste at the following facilities:

- a. CAF personnel (Bldg 18)
- b. IAP personnel for locations identified in Table 8-2.
- c. Emergency response personnel for spills and HW incidents.

Personnel who perform any of the following activities at the above locations and at other locations on BAFB are also required to receive hazardous waste training:

- a. decide which wastes are hazardous,
- b. transport, add, or remove hazardous waste to or from accumulation points,
- c. prepare documentation such as manifests, annual or biennial reports, or exception reports,
- d. provide response to spills, fires, or explosions involving hazardous waste,
- e. inspect hazardous waste accumulation, storage, treatment or disposal facilities,
- f. conduct any tasks involving occupational exposure to or which require management of hazardous waste, and
- g. supervise personnel performing hazardous waste activities.

The Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.120 mandates that all employees receive a specified number of health and safety training hours before they are permitted to engage in hazardous waste operations. This training must provide employees with the knowledge and skills necessary to perform their duties safely. This training, also referred to as hazardous waste operators emergency response (HAZWOPER), is in the form of 40-hour and 24-hour courses, and an 8-hour refresher course. These courses mainly cover hazardous

materials and health and safety issues related to emergency response, cleanup, and operation of permitted TSDFs.

Since BAFB is neither a Superfund site nor an operator of a TSDF, only emergency response personnel at BAFB should receive, at a minimum, the 24-hour course and an annual 8- hour refresher course. All other personnel including CEV and IAP managers, require specific HW management training established by RCRA under 40 CFR 264.16 (a)(1) and 265.16(a)(1). Various vendors and consulting companies offer 3 to 5 day HW Management Training courses which covers issues such as HW compatibility, manifests, storage, shipping, labeling, and land ban disposal. In addition, this course also covers some health and safety issues such as respirator use, and toxicology.

12.1.2 Training Frequency

Hazardous waste management training must be successfully completed by all personnel identified by BAFB using the criteria described above. New personnel with assignments that meet any of the conditions stated above must successfully complete training prior to their assignment. Until that time, untrained personnel must not perform any tasks involving hazardous waste management unless they are directly supervised by trained personnel. Each person receiving hazardous waste training must take part in an annual review of the training program.

12.2 SCOPE OF TRAINING

12.2.1 Individuals Responsible for Providing Training

CEV is responsible for ensuring hazardous waste training is accomplished. All hazardous waste management trainers; whether AF, contractor, or other entities, must be properly trained in order to train other AF personnel. All base environmental management personnel conducting hazardous waste training should receive training through the Air Force Hazardous Waste Training Program prior to training other BAFB personnel.

12.2.2 Training Components

The major components of hazardous waste training which must be imparted to all personnel includes the following:

- How to perform duties in a way which ensures BAFB compliance with federal, state and local hazardous waste regulations.
- Hazardous waste management procedures, including SPRP implementation.
- Response to emergencies involving hazardous waste.

Each hazardous waste management training session for BAFB personnel will include the following general topics to meet EPA, OSHA and AF requirements:

- Hazardous Material (HM) and HW Laws and Regulations
- HM Identification and Classification
- Land Disposal Restrictions
- Toxicology
- Waste Minimization
- Generator Requirements/Storage
- Reporting Requirements
- Shipping HW, Packaging, Labeling, Marking, and Manifesting
- Transporter Requirements
- Personal Safety
- Underground Storage Tanks (USTs)
- Spill Response Planning
- Contingency or Emergency Response Procedures

It is the responsibility of CEV personnel, in conjunction with the BEE and other pertinent base units, to design the training course to incorporate installation-specific materials such as the Base HWMP and SPRP to ensure that the training program meets state and regulatory requirements. The training can also be tailored to fit specific HW management training needs such as container labeling and waste segregation. The HW management procedures presented in this plan should be integrated into the BAFB training program, once developed.

12.2.3 Record Keeping

It is the responsibility of CEV to identify, in coordination with all base operating units, individuals requiring training using the criteria listed above. Each shop will maintain and annually update a list of shop personnel requiring hazardous waste training to reflect personnel turnover and changing hazardous waste management responsibilities. CEV will create, maintain and annually update a master list of BAFB personnel requiring hazardous waste training.

Table 12-1 represents a tracking log to be used by the individual shops to identify and track the training requirements of shop personnel and to determine when training is needed. Each employee must sign a dated statement when they complete HW training. Table 12-1 also serves as a central installation hazardous waste training record to be used by CEV for all base personnel which summarizes the employee and job title, prior type and date of HW training, the date training is required based on the time elapsed since previous training, and the dates HW training is scheduled and completed.

It is the responsibility of shop supervisors to maintain on file, a written job description for each position related to hazardous waste management. For the purposes of RCRA training record-keeping, the job description need only describe the job as it relates to the management and handling of hazardous waste. The description should also identify the requisite skills, education, or other qualifications and the duties of the facility personnel assigned to each

position. Job descriptions should be annually reviewed by CEV in coordination with the appropriate supervisory personnel and used as a basis for identifying potential training candidates.

Training records must be maintained which document that all appropriate personnel have successfully completed their required training. Records must be kept for current employees as long as they work on the installation, and for three years after the date they leave the base (or stop working at a position related to hazardous waste management). Training records may accompany personnel transferred to another installation, however, a copy of the record must be kept at BAFB for the three year period after their transfer.

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TABLE 12-1 HAZARDOUS WASTE TRAINING REQUIREMENTS FOR BAFB PERSONNEL - FY ____

Base Organization/ Activity	Employee Name	Job Title	Telephone No.	Prior Training and Date	Date Training Req'd		Date Scheduled	Date Completed
					40 hour	8 hour		
Horizontal Shop								
Entomology								
Vertical								
FMU								
Heat Plant								
Housing								
Utilities								
Power Production								

Fin.
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Base Organization/ Activity	Employee Name	Job Title	Telephone No.	Prior Training and Date	Date Training Req'd		Date Scheduled	Date Completed
					40 hour	8 hour		
Exterior Electric								
GOCESS								
QRC								
Store								
POL								
Maintenance								
Paint (Allied Trade)								
COPARS								
Tire								
Administration								
Bowling Center								
Marina								
Auto Hobby								
Arts & Crafts								
Photo Lab								
Medical								
Honor Guard								

Fin.
January 1998

Base Organization/ Activity	Employee Name	Job Title	Telephone No.	Prior Training and Date	Date Training Req'd		Date Scheduled	Date Completed
					40 hour	8 hour		
Exterior Electric								
GOCESS								
QRC								
Store								
POL								
Maintenance								
Paint (Allied Trade)								
COPARS								
Tire								
Administration								
Bowling Center								
Marina								
Auto Hobby								
Arts & Crafts								
Photo Lab								
Medical								
Honor Guard								

*Final
January 1998*

Base Organization/ Activity	Employee Name	Job Title	Telephone No.	Prior Training and Date	Date Training Req'd		Date Scheduled	Date Completed
					40 hour	8 hour		
Band								
Security Police								
AFOSI								
DIA								
HQ AFOSI/LG								
NDW Fire Department								

13. CONTINGENCY PLAN SUMMARY

A Spill Prevention and Response Plan (SPRP), February 1995, has been prepared for BAFB. The SPRP is located at CEV, Bldg 370. Emergency response actions involving HW spills, fires, and/or explosions shall be conducted in accordance with the requirements of this plan.

When a HW spill is detected, activity is stopped and the spill is contained as effectively as possible given unit capabilities and resources. The Base SPRP is activated in the event that a spill cannot be contained by the HW accumulation site staff.

The SPRP addresses issues such as: emergency response actions, emergency evacuation procedures, qualified individual duties, hazard identification procedures, containment procedures, proper response equipment usage and inspection, base drills/exercises, and personnel training.

Reporting of any incident at BAFB is mandatory and should be conducted as follows:

- In the event of a fire, explosion, or spill involving HW, personnel witnessing or discovering the emergency must notify the base fire department switchboard by telephone at 7-5777 (on-base) or 767-5777 (off-base), or by activating an alarm system, or both.
- In the event of minor spill/releases involving HW, CEV should be contacted at 7-1159. BAFB HW training program should give specific instructions to personnel regarding when each of the above notification procedures are appropriate.

14. PREPAREDNESS AND SPILL PREVENTION SUMMARY

BAFB's Spill Prevention Control and Countermeasures (SPCC), February 1996, is incorporated in the Spill Prevention and Response Plan Facility Response Plan (SPRP FRP). Preparedness and spill prevention measures should be under taken at BAFB in accordance with the requirements of this plan.

The plan addresses issues such as: secondary containment requirements, inspection procedures, preventative measures, housekeeping, material compatibility, security, and personnel training and spill prevention procedures.

The plan also identifies available spill response/hazardous materials equipment at BAFB. These materials are maintained at building 18 (CAF) and Building 58. CEV must ensure that all IAPs are provided with spill response kits. The IAP manager will ensure that the spill response kits are maintained and that personnel are properly trained in their use. Table 14-1 displays the spill response equipment available at BAFB.

TABLE 14-1. BAFB SPILL RESPONSE EQUIPMENT INVENTORY

<p><u>8 Sealed Spill Kits:</u></p> <p>Drum (1 each) Coveralls (1 each) Gloves, rubber (1 pair) Sorbent pads (1 bundle) Drain Cover (1 each) Sorbent Blanket (1 roll) Boom, 10' sections, small (4 each) Large Liner Plastic Bag (1 each) Locking Ring on Barrel (1 each)</p> <p><u>2 Partial Kits:</u></p> <p>1-Drum -Locking Ring -Gloves Rubber -Drain Cover -Sorbent Blanket, (1 roll) -Plastic Bag</p> <p>2-Drum -Locking Ring -Gloves Rubber -Drain Cover -Sorbent Blanket, (1 roll) -10' Booms (4 each)</p>	<p><u>Overpack Kit:</u></p> <p>Yellow Drum, screw Top (1 each) Sorbent Blanket, (1 roll) Gloves, rubber (1 pair) Garbage Bag w/tie (1 each) Sorbent pads, square (24 each) Boom, 10' sections, small (4 each) Sorbent C (106 bags) Sorbent Pads, 200 per pkg (22 pkg) Sorbent booms, small 40' per pkg (5 pkg) Sorbent booms, large 80' per pkg (10 pkg)</p>
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BAFB currently has its own HAZMAT team which is in the process of being expanded. Table 14-2 lists the members of the HAZMAT team and their current training status.

TABLE 14-3. MUTUAL AID AGREEMENTS

Mutual Aid Agreement	Telephone Number	Response Time
D.C. Fire Department HAZMAT Response Unit	(202) 673-3212	10 Minutes
P.G. County HAZMAT Response Unit	(301) 350-9700	20 minutes

15. POLLUTION PREVENTION SUMMARY

15.1 POLLUTION PREVENTION MANAGEMENT PLAN (PPMP)

BAFB will prepare, and regularly update, a PPMP pursuant to AF requirements stipulated in AFI 32-7080, *Pollution Prevention Program*. The PPMP will be maintained by the Environmental Manager as a stand alone document. The purpose of the PPMP is to provide a road map for base personnel to prevent pollution by implementing the following hierarchy of action: reducing the use of hazardous materials (source reduction), reusing generated waste and recycle waste not reusable (recycling), employing treatment, and only as a last resort disposing of wastes (end-of-pipe treatment).

The PPMP will address the process required to run a pollution prevention program; pollution prevention project funding requirements; a plan to meet pollution prevention metric goals; and actions required to execute the program. The PPMP is based on recurring Opportunity Assessments undertaken for pollutant generating activities at BAFB. The PPMP will contain management strategies for the following program elements:

- a. Hazardous waste
- b. EPA 17 industrial toxic chemicals
- c. Municipal solid waste
- d. Ozone depleting chemicals
- e. Affirmative procurement of environmentally friendly products
- f. Energy conservation
- g. Air and water pollutant reduction

15.2 POLLUTION PREVENTION REPORTING

15.2.1 Air Force

CEV will report quarterly summaries of hazardous waste generation and prior year data to the installation EPC for evaluating pollution prevention progress. These reports will be provided to higher AF authority to measure BAFB's performance against DoD and USAF reduction goals.

15.2.2 Federal and State

Biennial RCRA reports completed by CEV must describe efforts undertaken during the previous year to reduce the volume and toxicity of waste generated, and changes in volume and toxicity of waste achieved in comparison to previous years. The EPA requires biennial hazardous waste reporting and the DCRC requires annual reporting. The PPMP and waste generation reports will be used as the primary sources of information for compilation of this data.

Executive Order (EO) 12856 requires that BAFB comply with the requirements of the Emergency Planning and Community Right-to-Know Act (SARA Title III). The EO requires that all facilities meeting certain reporting requirements, prepare a Pollution Prevention Plan for 30 December 1995. CEV also must provide Toxic Release Inventory (TRI) data and other required reports for tracking and prevention of releases of chemicals above threshold values to the EPA.

15.3 Hazardous Material (HAZMAT) Pharmacy

The HAZMAT Pharmacy is an integral part to reducing hazardous materials and wastes on BAFB. CEV serves on the Hazardous Material Pharmacy Committee which meets monthly and is responsible for implementation of the HAZMAT Pharmacy Program and resolving concerns related to HAZMAT management at BAFB.

APPENDIX A

REFERENCES

DC Hazardous Waste Management Act, D.C.C. 6-701 et seq.

DC Hazardous Waste Management Regulations, 20A DCMR 40-54.

40 Code of Federal Regulations Parts 260-299.

49 Code of Federal Regulations Parts 100-177.

Air Force Hazardous Waste Management Policy, 6 June 1991.

Air Force Pamphlet 32-7043, 30 April 1994, Hazardous Waste Management Guide.

Air Force Pamphlet 32-7042, 12 May 1994, Hazardous Waste Management Guide.

Air Force Instruction 32-7005, 25 February 1994, Environmental Protection Committees.

Air Force Regulation 19-11, 14 July 1989, Hazardous Waste Management and Minimization.

Bolling Air Force Base, Spill Prevention and Response Plan, February 1995.

Bolling Air Force Base, Environmental Compliance Assessment and Management Program (ECAMP), Draft Report, 03 August 1994.